

Mailboxes	Compose	Rules	Settings	External	Directory	Log Out
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From:	"Neil Miller" <nmiller@mralaw.com>
To:	mlkem@industrialquicksearch.com
Subject:	document production & interrogatories
Cc:	
Bcc:	

ISO-8859-1

Address Book Send

$\Delta \pi$ EXHIBIT	26
Deponent	Meiresonne
Date	3-1-11 Rptr. ER
WWW.DEPOBOOK.COM	

Thanks for the latest e-mail re Thomas people.

I have a quick question regarding the voluminous advertiser files you mentioned are maintained in your office (which we will invite Thomas to come out and review). Do these files contain material in the 1999 - November 15, 2001 time period, or was that material all thrown out? It affects how I respond to document request no. 22. Please advise. Thanks.

☐ Send as HTML

Spell Check

Attachment:



Attachment:

Attachment:

Composing a message (?)

Mailboxes	Compose	Rules	Settings	External	Directory	Log Out
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Mailboxes	Compose	Rules	Settings	External	Directory	Log Out
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	Next Unread	Reply	Reply To All	Forward	
	Back to InBox	Delete	Set Flag	Close as Unread	

From: Mike Meiresonne <mikem@industrialquicksearch.com>
 Subject: re: document production & interrogatories
 Date: Wed, 30 Apr 2003 08:33:25 -0400
 To: Neil Miller <nmiller@mralaw.com>

it should but rather limited since we did clean out some details because of space...also, the reps still have all my files for review which will have greater details

Mike Meiresonne
 Industrial Quick Search, Inc.
 1500 East Beltline Suite 265
 Grand Rapids, MI. 49506
 Phone: 877-977-5377
 Fax: 616-285-3980
 www.industrialquicksearch.com
 mikem@industrialquicksearch.com



To be removed from the IQS email list please click below.
<http://www.industrialquicksearch.com/removemail.htm>
 ----- Original Message -----

FROM: "Neil Miller" <nmiller@mralaw.com>
 TO: mikem@industrialquicksearch.com
 DATE: Tue, 29 Apr 2003 19:48:03 -0400

SUBJECT: document production & interrogatories

Thanks for the latest e-mail re Thomas people.

I have a quick question regarding the voluminous advertiser files you mentioned are maintained in your office (which we will invite Thomas to come out and review). Do these files contain material in the 1999 - November 15, 2001 time period, or was that material all thrown out? It affects how I respond to document request no. 22. Please advise. Thanks.

	Next Unread	Reply	Reply To All	Forward	
	Back to InBox	Delete	Set Flag	Close as Unread	

Copy	Move	Remove
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Deponent MeirsonneDate 3-1-11 Rptr. CR

WWW.DEPOBOOK.COM

Subject : response to your recent e-mails & fax
Date : Wed, 7 May 2003 12:53:00 -0400
Linked to: Neil Miller
From : "Neil Miller" <nmler@mrallaw.com>
To : <mikem@industrialquicksearch.com>

1. The confidentiality stipulation. It came up because we referred to the need for one in at least one of our responses to their document requests. Personally, I believe what they drafted was overly broad. Under their draft, nothing can be disclosed or used for non-litigation purposes, and the only standard for confidentiality is that the information is "not readily known or available to the public." I generally prefer to limit confidentiality to true trade secrets (e.g., customer lists, financial information, secret formulas) and put the onus on the person asserting confidentiality to justify it. However, I note that even their draft allows any party to use or disclose the contents of "publicly available documents, its own documents or copies of documents obtained from any source other than through discovery in this action" (para. 4). Given your ability to get information through your contacts, it might be to our benefit to agree to the broad confidentiality provisions drafted, since it will apply to the documents we have already produced. Please call to discuss.
2. The underprint. It is certainly very interesting that Alisa Fogel states there will be 30,000 print units for 2003, but the Thomas website still has the April 16, 2002 statement that 40,000 inserts are needed. Is there any advertising material prepared by Thomas where we can show not only instructions to reps, but representations made to advertisers as to the number of print editions?
3. Two important letter (or e-mails) that we don't seem to have - the April 5, 2002 letter referred to in your April 11, 2002 letter, and your termination letter, presumably sent about March 1, 2002.
4. We should start developing the information needed on the lack of any damages arising from your selling both IQS and Thomas. Would it be possible to prepare a chart showing each IQS advertiser for whom an order was obtained anytime between the beginning of IQS' operations, the dollar amount spent by the advertiser with IQS each year and the amount each such advertiser spent on Thomas in the same years and the immediate year prior? The chart should be contained in the middle of a letter to me, so that we can maintain, at least for now, a claim of privilege, although the underlying information is clearly not privileged and will no doubt have to be disclosed at some point if there is a demand for the information. At least for now, do not go outside of your own organization for information. If you do not have the figures for any Thomas advertisers in territories other than your own,

just leave a blank for now.

5. While not pleaded with great specificity, Thomas no doubt will claim copyright infringement not only in the PDM, but in the selection of categories. How do the product categories on the IQS website compare with the Thomas register (both print and online), both in terms of number of categories and category titles? How did IQS derive its categories? One legal issue that either Doug Siegel's firm or us should look at is whether the category titles can even be copyrighted (I suspect they are not).

Mailboxes	Compose	Rules	Settings	External	Directory	Log Out
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From:	"Neil Miller" <nmiller@mralaw.com>
To:	mikem@industrialquicksearch.com
Subject:	automatic disclosures due May 15
Cc:	
Bcc:	

ISO-8859-1

$\Delta \pi$ EXHIBIT 29 Deponent <u>Meisner</u> Date <u>3-1-11</u> Rptr. <u>rd</u> WWW.DEPOBOOK.COM
--

Mike - Attached to this e-mail is a draft of the automatic disclosures we must make by May 15 (they must make the disclosures too). While much of this tracks the interrogatory answers already served, we must set forth computations of damages where we already know it.

Please review, fill in the blanks regarding good faith estimates on number of selling aids and advertiser and prospect files not returned (unless you have an actual number) and get back to me with any changes. If at all possible, get back to me today, since I have a trial starting tomorrow and will in all likelihood not be in the office very much for the next few days.

I assume you never heard from Ron regarding the source of

☐ Send as HTML

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Attachment:		<input type="button" value="Browse"/>

Composing a message

Mailboxes	Compose	Rules	Settings	External	Directory	Log Out
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Full copy of e-mail sent to Mike Meiresonne on 5/13/03

Mike - Attached to this e-mail is a draft of the automatic disclosures we must make by May 15 (they must make the disclosures too). While much of this tracks the interrogatory answers already served, we must set forth computations of damages where we already know it.

Please review, fill in the blanks regarding good faith estimates on number of selling aids and advertiser and prospect files not returned (unless you have an actual number) and get back to me with any changes. If at all possible, get back to me today, since I have a trial starting tomorrow and will in all likelihood not be in the office very much for the next few days.

I assume you never heard from Ron regarding the source of the numbers he used in alleging damages in Counts VIII through XI of the counterclaims/third-party claims. Thus I have simply referred to our interrogatory answers on those counts. Of course, if there is further information on that, let me know.

Regards,

Neil

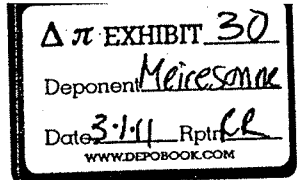
MILLER ROSADO & ALGICO LLP
ATTORNEYS AT LAW

200 OLD COUNTRY ROAD
SUITE 590
MINEOLA, NEW YORK 11501

Louis Algios
Christopher Rosado
Neil A. Miller

(516) 512-0200
FAX: (516) 741-7758

Ezra Huber
of counsel



May 30, 2003

Mark A. Fowler, Esq.
Satterlee Stephens Burke
& Burke, LLP
230 Park Avenue
New York, New York 10169

Re: Thomas Publishing Co., et ano v. Industrial Quick
Search, Inc., et al;
S.D.N.Y. Case No. 01 CIV 3307 (RO)

Dear Mr. Fowler:

Enclosed are the following documents which may also be responsive to your document requests:

1. Memorandum from "CTH-K" to "EVD; PHL" dated November 26, 2001, which document was apparently sent with the December 13, 2001 letter from E.V. Dillon to Michael Meiresonne, which letter is part of exhibit U to defendants' responses.
2. Letter dated January 19, 2002 from Mr. Meiresonne to Mr. Dillon, which should be added to exhibit U.
3. Letter dated February 1, 2002 from Mr. Dillon to Mr. Meiresonne, which should be added to exhibit U.
4. Letter dated February 14, 2002 from Mr. Meiresonne to Mr. Dillon, which should be added to exhibit U.
5. Letter dated February 26, 2002 from Mr. Dillon to Mr. Meiresonne, which should be added to exhibit U.
6. Letter dated March 1, 2002 from Mr. Meiresonne to Mr. Dillon, which should be added to exhibit U.

7. Letter dated April 5, 2002 from Carl T. Holst-Knudsen to Mr. Meiresonne, which should be added to exhibit A.

I have also enclosed a marked up copy of the Confidentiality Stipulation and Order with my suggested changes. As you can see, among other things I have eliminated the "Highly Confidential" category you created, as I am uncertain as to how to distinguish Confidential from Highly Confidential documents and I doubt there will be anything produced in this action which would require the extreme protections you drafted for Highly Confidential documents.

Very Truly Yours,

A handwritten signature in dark ink, appearing to read "Neil A. Miller", with a long horizontal flourish extending to the right.

Neil A. Miller

Enc.

bcc: Mike Meiresonne (w/o encs.)
VIA FAX 616-285-3980

MILLER, ROSADO & ALGIOS, LLP
ATTORNEYS AT LAW
200 Old Country Road
Suite 590
Mineola, New York 11501
(516) 512-0200
Telecopier: (516) 741-7758

Please deliver the following page(s) to:

NAME: Mike Meiresonne

TELECOPIER: 616-285-3980

FROM: Neil A. Miller, Esq.

DATE: May 30, 2003

Total Number of Pages Being Transmitted: 3

RE: Thomas Publishing Co., et ano v. Industrial Quick Search, Inc. et al.

TRANSMITTER: BONNIE SIEGEL

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED.

***** -JOURNAL- ***** DATE MAY-30-2003 ***** TIME 12:09 *****

DATE/TIME = MAY-30 12:08
JOURNAL NO. = 25
COMM.RESULT = OK
PAGES = 03
FILE NO. =
DURATION = 00:01'17
MODE = XMT
STATION NAME =
TELEPHONE NO. = T 16162853980
RECEIVED ID =
RESOLUTION = STANDARD

-LAW OFFICE -

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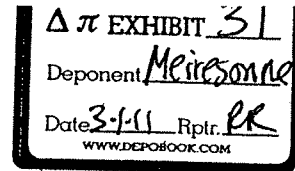
MILLER ROSADO & ALGIOS, LLP
ATTORNEYS AT LAW

200 OLD COUNTRY ROAD
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MINEOLA, NEW YORK 11501

Louis Algios
Christopher Rosado
Neil A. Miller

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FAX: (516) 741-7758

Ezra Huber
of counsel



June 12, 2003

BY OVERNIGHT MAIL

Mike Meiresonne
Industrial Quick Search, Inc.
1500 East Beltline
Suite 265
Grand Rapids, Michigan 49506

Re: Thomas Publishing Co., et ano v. Industrial Quick
Search, Inc., et al;
S.D.N.Y. Case No. 01 CIV 3307 (RO)

Dear Mike:

Enclosed are the discovery responses I received in today's mail, together with deposition notices to take each defendant's deposition (of course you will be the deponent for Industrial Quick Search, Inc. and Meiresonne & Associates, Inc.), as well as the cover letter from plaintiffs' counsel.

As expected, in light of the automatic disclosures already given and the limited scope of allowable interrogatories in the Southern District of New York, the interrogatory answers provide no significant new information. The responses to the document requests are quite interesting, in that they seek to limit in unspecified ways some of the more important document requests (for example, requests no. 15, 26, 27, 52, 53), and object without any offer to produce documents on other important document requests (for example, requests no. 23, 25, 28, 29, 33-36, 46-49, 55, 57, 58).

Moreover, many of the responses state a willingness to produce documents subject to an acceptable confidentiality agreement. As you can see from counsel's cover letter, I am

awaiting comments on my marked version of the Confidentiality Stipulation and Order.

I have little doubt that, while negotiations may produce movement on some of the positions plaintiffs took on document requests, we will end up in some form of motion practice or conferences with respect to both compelling responses to some of our document requests and a confidentiality stipulation and order. In any event, after you have had a chance to review the responses, please call me.

Since we have already produced many documents, and we have yet to see any, I would like to first suggest to plaintiffs' counsel that plaintiffs produce documents for which there is no dispute. I am assuming that the document production in Michigan relates to documents deriving from the files of the third-party defendants, and that your Michigan counsel will be handling that production.

We must schedule Janet Pratt's and your depositions, as well as plan the depositions of the people at Thomas we wish to take (of course we will notice the third-party defendants). While their cover letter mentions doing Janet's and your deposition in early July, I do not know your respective schedules, and I would want to see at least some of their document production prior to your depositions. We can discuss this further when you call me.

I hope all is well, and look forward to hearing from you soon.

Cordially,

A handwritten signature in dark ink, appearing to read "Neil A. Miller", with a long horizontal flourish extending to the right.

Neil A. Miller

Enc.

001 (002) 8-10 USE THE INTERNATIONAL AIRWAYBILL FOR SHIPMENTS TO PUERTO RICO

Sender Account Number 138799423		Preprint Format No. 69751730		Origin LIQ		Airbill Number 3789746332	
FROM (Company) MILLER ROSADO & ALGIOS				3 Payment Sender will be billed unless marked otherwise		4 Service Type	
Street Address STE 590 200 OLD COUNTRY RD				Receiver 3rd Party <input type="checkbox"/> <input type="checkbox"/>		One box must be checked. Assured Express must be checked.	
City MINEOLA				Paid In Advance <input type="checkbox"/> Check No. <input type="checkbox"/> Amount <input type="checkbox"/>		10:30 A.M. Extra charge.	
State NY				Billing Reference (will appear on invoice) Industrial Quick		Next Afternoon over 6 lbs charged at the Express rate.	
Zip 11501				5 # of Pgs 1		6 Weight (LBS) 1	
Sent by (Name/Dept) CHRISTOPHER KOLODOZ				7 Packaging One box must be checked <input checked="" type="checkbox"/> Express Pack <input type="checkbox"/> Other Packaging		*Express (Letter - 150 lbs) 10:30	
2 TO (Company) PLEASE PRINT NEATLY Industrial Quick Search Inc.				Special Instructions <input type="checkbox"/> Saturday Delivery Extra charge <input type="checkbox"/> Hold at Airborne <input type="checkbox"/> Express only Not available to all locations <input type="checkbox"/> Lab Pack Service		*Next Afternoon (Letter - 5 lbs)	
Street Address 1500 EAST BELTZING STE 265				Declared Value <input type="checkbox"/> or Asset Protection <input type="checkbox"/> Shipment Valuation \$ 00		*Second Day (Letter - 150 lbs)	
City GRAPEVILLE				<div>Thank You for Shipping with Airborne!</div>		*Service may vary by destination. visit www.airborne.com	
State PA						ABSSENT A HIGHER SHIPMENT VALUATION. CARRIER'S LIABILITY IS LIMITED TO \$100 PER PACKAGE OR ACTUAL VALUE, WHICHEVER IS LESS. SPECIAL OR CONSEQUENTIAL DAMAGES ARE NOT RECOVERABLE. SEE TERMS AND CONDITIONS ON REVERSE SIDE OF THIS NON-NEGOTIABLE AIRBILL. SCAC-APB FED ID. NO. 01-0637460	
Zip 17320						AIRBORNE EXPRESS.	
Attention: (Name/Dept) MIKE HEISELSONNE				PO BOX 662, SEATTLE, WA 98111-0662 1-800-247-2876			
Description							
Sender's Signature <i>[Signature]</i>		Date 6/17/03		Airborne Signature		Date	
www.airborne.com				SENDER'S COPY			

Date 3-1-11 Rptr. PR
WWW.DEPOBOOK.COM

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From: Mike Meiresonne <mikem@industrialquicksearch.com>
Subject: typical
Date: Mon, 16 Jun 2003 07:39:59 -0400
To: Neil Miller <nmiller@mralaw.com>

I feel a little foolish that we provided all the docs and they basically blew us off....even though they will provide some based on a confidentiality agreement.

Did we ask for Dave's contract and his rep's contract after 5/1/2002? Didn't we ask for financial info for all parties?

It seems that it will take some time to get these docs so deps will be delayed until we go through all the motions to get docs...agree?

I also think we will have to try to get a court order to get all Andy's and Cindi's emails since I know they have been bashing me and my company.

Since Doug Tucker has left TR, do you think we should offer a settlement to him? It would be interesting to see how their lawyers handle this apparent conflict of interest.

It seems that all parties will have to be very obtuse on almost every matter here on out....agree?

talk with you later...

Mike Meiresonne
Industrial Quick Search, Inc.
1500 East Beltline Suite 265
Grand Rapids, MI. 49506
Phone: 877-977-5377
Fax: 616-285-3980
www.industrialquicksearch.com
mikem@industrialquicksearch.com

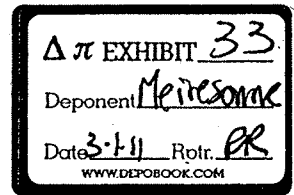
To be removed from the IQS email list please click below.
<http://www.industrialquicksearch.com/removemail.htm>

	Next Unread	Reply	Reply To All	Forward	
	Back to InBox	Delete	Set Flag	Close as Unread	
Copy to...		Move to...		Redirect to...	
Take Address					

MILLER, ROSADO & ALGIOS, LLP
ATTORNEYS AT LAW
200 OLD COUNTRY ROAD
SUITE 590
MINEOLA, NEW YORK 11501

Louis Algios
Christopher Rosado
Neil A. Miller

(516) 512-0200
FAX: (516) 741-7758



July 1, 2003

BY FAX (616-285-3980)

Mike Meiresonne
Industrial Quick Search, Inc.
1500 East Beltline
Suite 265
Grand Rapids, Michigan 49506

Re: Thomas Pub. Co., et ano v. IQS, et al

Dear Mike:

I finally received a revised confidentiality stipulation from plaintiffs' counsel. They effectively accepted all of my changes, with two notable exceptions. Those two issues are discussed in my response, which is enclosed.

As you may be able to tell from my response, I also have been exchanging telephone messages today with plaintiffs' counsel. One of their messages indicated I could review documents next Wednesday, July 9. The message also indicated they are preparing a letter detailing their response to the objections we asserted when we produced documents.

I will keep you abreast of all developments. If I do not speak to you beforehand, enjoy the upcoming holiday weekend.

Cordially,

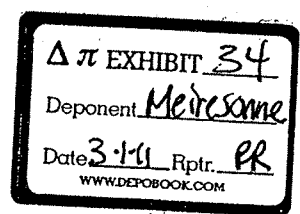
Neil A. Miller

Enc.

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SUITE 590
MINEOLA, NEW YORK 11501

Louis Algios
Christopher Rosado
Neil A. Miller

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July 14, 2003

BY FAX (616-285-3980)

Mike Meiresonne
Industrial Quick Search, Inc.
1500 East Beltline
Suite 265
Grand Rapids, Michigan 49506

Re: Thomas Pub. Co., et ano v. IQS, et al

Dear Mike:

Enclosed is a letter that Thomas' attorneys faxed over late Friday, as well as the enclosures thereto. My comments are as follows:

1. We are obviously heading for a major fight over their responses to our document requests. While I will write back with respect to requests no. 15, 25-27, 52 and 53 to point out how ridiculous it is for me to know what they believe is a properly limited request, there are simply too many other requests for which we will have to compel responses.

2. In that upcoming letter, I will also respond to their comments on our responses to their document requests. Please call me to discuss same when you have an opportunity.

3. Unless you have any objection, I will sign the confidentiality Stipulation and Order, since we received most of the changes we requested. Most importantly, I convinced them to drop the provision which would have forbidden you from using non-confidential discovery solely for the purposes of this action. However, this leads me to believe that anything they think is embarrassing will be stamped "confidential", and we will have to initiate the procedure for resolving the confidentiality claim set forth in paragraph 9. Nevertheless, I believe it is worth

doing, because the burden will be on them to prove that a document is truly confidential.

When we speak with regard to item 2, do not hesitate to ask any other questions regarding any of these matter.

Cordially,

A handwritten signature in dark ink, appearing to read "Neil A. Miller", with a long, sweeping horizontal stroke extending to the right.

Neil A. Miller

Enc.

SATTERLEE STEPHENS BURKE & BURKE LLP
230 PARK AVENUE
NEW YORK, NY 10169-0079
(212) 818-9200

47 MAPLE STREET
SUMMIT, NJ 07901
(908) 277-2221

FAX (212) 818-9606, 9607
www.ssb.com

E-Mail: wsaurack@ssbb.com
Direct Dial: (212) 404-8703

July 11, 2003

Via Facsimile

Neil A. Miller, Esq.
Miller, Rosado & Algios, LLP
200 Old Country Road, Suite 590
Mineola, New York 11501

Re: Thomas Publishing Company v. Meiresonne & Associates, Inc., et al.

Dear Mr. Miller:

We write in response to your June 30, 2003 letter and in response to defendants' objections to plaintiffs' First Request for Production of Documents and Information (the "Response").

In response to your June 30 letter, with respect to Document Request Nos. 15, 25, 26, 27, 52 and 53, obviously it is not plaintiffs' responsibility to draft defendants' discovery requests. We submit that defendants should properly limit these requests. As for Document Request Nos. 17, 28, 29, 39, 42, 43, 46 to 49 and 55 to 58, plaintiffs stand by their original objections. Plaintiffs will provide defendants with any documents responsive to Document Request No. 23. With respect to Document Requests Nos. 33 to 36, these individuals did form corporations, and plaintiffs will produce records of compensation paid to these corporations by Blueline Resources, LLC. Lastly, with respect to Document Request No. 38, plaintiffs state that they possess no documents responsive to defendants' revised version of this request; indeed, upon investigation, it appears that there are no documents responsive to Request No. 37 to which you have informed us that Request No. 38 refers.

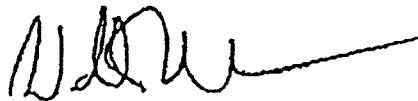
As for defendants' Response, as a general matter, please confirm that defendants have not withheld documents where they produced documents subject to objections. With respect to defendants' specific objections, plaintiffs are willing to limit Document Request No. 2 to persons who during their employment or retention played a role in copying the *Thomas Register* and/or developing IQS in any manner. As for Document Request No. 6, a confidentiality agreement will obviate any objection based upon the proprietary nature of the materials requested, and these documents are highly relevant to plaintiffs' false advertising claim. As for Document Request No. 7, the documents requested are relevant, inter alia, to plaintiffs' unfair competition and tortious interference with business relations claim.

Neil A. Miller, Esq.
July 11, 2003
Page 2

With respect to Document Request No. 9, plaintiffs have information that leads them to believe that Mr. Kezeli and/or TR Marketing may have been involved with setting up IQS and participated in various of the transactions averred in plaintiffs' Second Amended Complaint (the "Complaint"). Plaintiffs are willing to limit this request to documents concerning Mr. Kezeli and/or TR Marketing that relate to IQS and/or the allegations in the Complaint. With respect to Document Request Nos. 17 and 25, these documents are highly relevant to, inter alia, plaintiffs' unfair competition and tortious interference with business relations claims. Lastly, Document Request Nos. 39 to 41 are relevant to plaintiffs' defamation claims.

Also, attached is a black-lined and clean version of the Confidentiality Agreement. Please execute the clean version and send it back to me. We still need to set up dates for the inspections in both New York and Michigan and should begin setting up dates for party and non-party depositions.

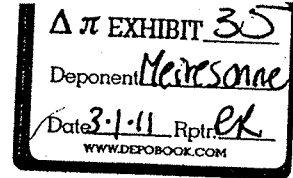
Sincerely,



Walter A. Saurack

WAS/jc
Attachment

MILLER, ROSADO & ALGIOS, LLP
ATTORNEYS AT LAW
200 Old Country Road
Suite 590
Mineola, New York 11501
(516) 512-0200
Telecopier: (516) 741-7758



FAX SHEET

Please deliver the following page(s) to:

TO: Mike Meiresonne
TELECOPIER: (616) 285-3980
FROM: Neil A. Miller, Esq.
DATE: 7/17/03

Total Number of Pages Being Transmitted: 3

RE:

TRANSMITTER: REGINA ALLEN

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED.

MILLER ROSADO & ALGIOS, LLP
ATTORNEYS AT LAW

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MINEOLA, NEW YORK 11501

Louis Algios
Christopher Rosado
Neil A. Miller

(516) 512-0200
FAX: (516) 741-7758

Ezra Huber
of counsel

July 17, 2003

BY OVERNIGHT MAIL

Walter A. Saurack, Esq.
Satterlee Stephens Burke
& Burke, LLP
230 Park Avenue
New York, New York 10169

Re: Thomas Publishing Co., et ano v. Industrial Quick
Search, Inc., et al;
S.D.N.Y. Case No. 01 CIV 3307 (RO)

Dear Mr. Saurak:

Enclosed are three copies of the confidentiality agreement, all with my original signature. Please send me back one fully executed original and, after the court signs, a copy as "so ordered".

As to your response to defendants' document requests, please clarify whether your response to request nos. 33-36 will include all amounts paid to the corporations formed by the individual third-party defendants by Thomas Publishing Company and PINI, as well as by Blueline Resources. With respect to defendants' document request nos. 17, 28, 29, 39, 42, 43, 46-49 and 55-58, we will have no choice but to seek Court intervention since you are standing on your original objections without explanation. Similarly, since I cannot possibly guess what you believe a properly limited document request would entail, the Court will need to resolve your objections to request nos. 15, 25, 26, 27, 52 and 53.

As to defendants' objections to your document requests, even as limited, we stand by our objection to request no. 2. We stand

by our objections to requests no. 7, 17, 25 and 39-41. With respect to request no. 6, I am not certain even what is being requested. IQS did not develop, and does not possess, the software code used in the Goldmine software which software IQS obtained a license to use. I need clarification as to what a document "relating to, concerning, reflecting or constituting" the software code would be, other than every single document ever generated using such software (and to which we would stand by our objection). As to request no. 9, I do not know the source of your information that leads you to believe that Mr. Kezeli or his company was involved with setting up IQS, and I do not know in which transactions pleaded in the second amended complaint you believe he participated. Please provide us with this information so that we can better evaluate whether to accept your request as limited.

Please contact me immediately so that we can arrange all necessary inspections of documents, and establish at least some deposition dates. As I previously mentioned to you, in light of the delays in the production of documents while we discussed the terms of a confidentiality agreement, I do not believe that we will be able to adhere to the current deadlines, and believe we should seek an extension of them sooner rather than later.

Very Truly Yours,

A handwritten signature in dark ink, appearing to read "Neil A. Miller", with a long horizontal flourish extending to the right.

Neil A. Miller

Enc.

Mailboxes	Compose	Rules	Settings	External	Directory	Log Out
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	Next Unread	Reply	Reply To All	Forward	
	Back to InBox	Delete	Set Flag	Close as Unread	

Δ π EXHIBIT 36
 Deponent Meirsonne
 Date 3/11 Rptr. RR
 WWW.DEPOBOOK.COM

From: "Ron M. Redick" <Rredick@MMBJLAW.COM>
Subject: TPC Document review
Date: Thu, 24 Jul 2003 11:00:02 -0400
To: <nmiller@mralaw.com>
Cc: <mikem@industrialquicksearch.com>

Neil,

I have arranged to perform the TPC document review at the offices of Miller Johnson on August 6 at 9:00. Sal Pirrotta indicates that they have 15 banker boxes to produce, but he thinks much of it is the "renewal kits" that will probably not be of interest

I presume you will be contacting me between now and August 6 to discuss what documents in particular you are interested in. Please either call me or send me something in writing in this regard.

On that same note, Mike Meirsonne has asked whether he needs to be at the document review. Do you think that would be necessary or helpful? Please let me know your thoughts.

Ronald M. Redick
 Mika Meyers Beckett & Jones, PLC
 Attorneys at Law
 900 Monroe Ave NW
 Grand Rapids MI 49503-1423
 Tel: 616 632 8000
 Fax: 616 632 8003
 Direct: 616 632 8053
 E-mail: rredick@mmbjlaw.com
 Website: www.mmbjlaw.com

***** This message is for the addressee only. It may be confidential, and may include communications protected by the attorney-client privilege, work product protected from discovery in litigation, or inside information regarding business transactions. Unauthorized use, disclosure or copying is prohibited and may be unlawful. If you have received this message in error, please call the sender at 616-632-8000 and delete the message from your system. *****

	Next Unread	Reply	Reply To All	Forward	
	Back to InBox	Delete	Set Flag	Close as Unread	

Copy to...	Move to...	Redirect to...

Take Address

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Mailboxes	Compose	Rules	Settings	External	Directory	Log Out
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	Back to InBox	Delete	Set Flag	Close as Unread	

$\Delta \pi$ EXHIBIT 37
 Deponent Meiresonne
 Date 3-1-11 Rptr. ER
 WWW.DEPOBOOK.COM

From: Mike Meiresonne <mikem@industrialquicksearch.com>
 Subject: re: TPC Document Review
 Date: Thu, 24 Jul 2003 10:51:19 -0400
 To: Ron M. Redick <Rredick@mmbjlaw.com>
 Cc: Neil Miller <nmiller@mralaw.com>

Neil's number is 516-512-0200 and email is nmiller@mralaw.com

I am wondering what docs we need in Michigan that would require 15 boxes???

I should expect to be there as well on the 6th?

thanks

Mike Meiresonne
 Industrial Quick Search, Inc.
 1500 East Beltline Suite 265
 Grand Rapids, MI. 49506
 Phone: 877-977-5377
 Fax: 616-285-3980
 www.industrialquicksearch.com
 mikem@industrialquicksearch.com

To be removed from the IQS email list please click below.
<http://www.Industrialquicksearch.com/removemail.htm>

----- Original Message -----

From: "Ron M. Redick" <Rredick@MMBJLAW.COM>
 To: <mikem@industrialquicksearch.com>
 Date: Thu, 24 Jul 2003 10:02:31 -0400
 Subject: TPC Document Review

Mike,



We will be performing the TPC litigation document review on August 6 at the offices of Miller Johnson. I understand that there are approximately 15 bankers boxes being produced.


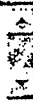
BTW, when you have a chance, could you e-mail me Neil Miller's phone # and e-mail address. Thanks.

Ronald M. Redick
 Mika Meyers Beckett & Jones, PLC
 Attorneys at Law
 900 Monroe Ave NW
 Grand Rapids MI 49503-1423
 Tel: 616 632 8000
 Fax: 616 632 8003
 Direct: 616 632 8053

E-mail: fredick@mmbjlaw.com
Website: www.mmbjlaw.com

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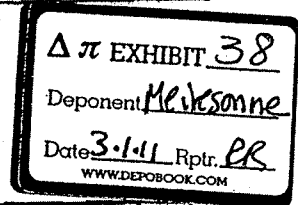
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<input type="checkbox"/>	Back to InBox	Delete	Set Flag	Close as Unread	<input type="checkbox"/>



From: "Ron M. Redick" <Rredick@MMBJLAW.COM>
Subject: re: TPC Document Review
Date: Fri, 25 Jul 2003 11:20:35 -0400
To: <mikem@industrialquicksearch.com>
Cc: <nmiller@mralaw.com>

Mike,

I have followed-up with Neil, and he indicates that he has spoken with you regarding this and has indicated that you should be present -- at least initially -- at the document review, to help identify what is and is not relevant.

We are to be at Miller Johnson at 9:00 on August 6. I am bringing one legal assistant with me to help. We can either meet you there, or else you can come to our office a little early and we can go over together. Let me know your preference as we start to approach the date. Thanks.

Ronald M. Redick
 Mika Meyers Beckett & Jones, PLC
 Attorneys at Law
 900 Monroe Ave NW
 Grand Rapids MI 49503-1423
 Tel: 616 632 8000
 Fax: 616 632 8003
 Direct: 616 632 8053
 E-mail: rredick@mmbjlaw.com
 Website: www.mmbjlaw.com

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>>> Mike Meiresonne <mikem@industrialquicksearch.com> 07/24/03 10:51AM >>>

Neil's number is 516-512-0200 and email is nmiller@mralaw.com

I am wondering what docs we need in Michigan that would require 15 boxes???

I should expect to be there as well on the 6th?

thanks

Mike Meiresonne
 Industrial Quick Search, Inc.

1500 East Beltline Suite 265
Grand Rapids, MI. 49506
Phone: 877-977-5377
Fax: 616-285-3980
www.industrialquicksearch.com
mikem@industrialquicksearch.com

To be removed from the IQS email list please click below.
<http://www.industrialquicksearch.com/removemail.htm>

----- Original Message -----

From: "Ron M. Redick" <Rredick@MMBJLAW.COM>
To: <mikem@industrialquicksearch.com>
Date: Thu, 24 Jul 2003 10:02:31 -0400
Subject: TPC Document Review



Mike,



We will be performing the TPC litigation document review on August 6 at the offices of Miller Johnson. I understand that there are approximately 15 bankers boxes being produced.

BTW, when you have a chance, could you e-mail me Neil Miller's phone # and e-mail address. Thanks.

Ronald M. Redick
Mika Meyers Beckett & Jones, PLC
Attorneys at Law
900 Monroe Ave NW
Grand Rapids MI 49503-1423
Tel: 616 632 8000
Fax: 616 632 8003
Direct: 616 632 8053
E-mail: rredick@mmbjlaw.com
Website: www.mmbjlaw.com

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	Back to InBox	Delete	Set Flag	Close as Unread	

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Mailboxes	Compose	Rules	Settings	External	Directory	Log Out
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	Back to InBox	Delete	Set Flag	Close as Unread	

$\Delta \pi$ EXHIBIT 39

Deponent Meiresonne

Date 3-1-11 Rptr. ER

WWW.DEPOBOOK.COM

From: Mike Meiresonne <mikem@industrialquicksearch.com>
Subject: here is some info you need to ok to make available for inspection
Date: Sun, 27 Jul 2003 13:46:11 -0400
To: Neil Miller <nrmiller@mralaw.com>

- 1) the massive editorial update project including 3-4 boxes of listings updates for 2000 time frame
- 2) TR advertiser's files
- 3) TR advertiser production files
- 4) copies of 2002 film for ads run in TR
- 5) TR pinks(order forms) for 2003 that TR should have
- 6) all the mail sent to MM of Thomas Register
- 7) TR problem accounts from 2000 on--any earlier?

IQS

- 1) IQS listing requests from companies to be put on the various sites
- 2) IQS site folders containing the information that we write our editorial and other information used to build the site and rerank the site

Anything else you can think of or not to include?

thanks

Mike Meiresonne
Industrial Quick Search, Inc.
1500 East Beltline Suite 265
Grand Rapids, MI. 49506
Phone: 877-977-5377
Fax: 616-285-3980
www.industrialquicksearch.com
mikem@industrialquicksearch.com

To be removed from the IQS email list please click below.
<http://www.industrialquicksearch.com/removemail.htm>

	Next Unread	Reply	Reply To All	Forward	
	Back to InBox	Delete	Set Flag	Close as Unread	

Copy to	Move to	Redirect to
Take/Address		

Mailboxes	Compose	Rules	Settings	External	Directory	Log Out
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MILLER ROSADO & ALGIOS, LLP
ATTORNEYS AT LAW

200 OLD COUNTRY ROAD
SUITE 590
MINEOLA, NEW YORK 11501

Louis Algios
Christopher Rosado
Neil A. Miller

(516) 512-0200
FAX: (516) 741-7758

Ezra Huber
of counsel

Δ π EXHIBIT	40
Deponent	Meiresonne
Date	3-1-11 Rptr. ER
WWW.DEPOBOOK.COM	

July 31, 2003

BY FAX (212-818-9607) AND REGULAR MAIL

Walter A. Saurack, Esq.
Satterlee Stephens Burke
& Burke, LLP
230 Park Avenue
New York, New York 10169

Re: Thomas Publishing Co., et ano v. Industrial Quick
Search, Inc., et al;
S.D.N.Y. Case No. 01 CIV 3307 (RO)

Dear Mr. Saurack:

This will confirm that you will be inspecting documents at Mr. Meiresonne's office in Grand Rapids, Michigan on August 4 and 5, 2003. As I understand it, Ron Redick, Esq., an attorney with the Michigan firm representing Mr. Meiresonne, and Mr. Meiresonne will be reviewing documents at the Miller Johnson firm on August 6, 2003, commencing at 9 a.m. Please confirm.

As to Mark Fowler's letter dated July 28, 2003, while I disagree that the promotional piece in question implies any association, connection or relationship between IQS and Thomas, this will confirm that the promotional piece has been discontinued.

To follow up on our meeting of July 23, 2003 and our objections to certain of your document requests:

1. Request no. 2 - this will confirm that IQS has no organization chart.
2. Request no. 6 - at the meeting, you indicated that you

were looking for the program for the IQS website so as to compare it to the Thomas website. To confirm what I told you thereafter, I checked with Mr. Meiresonne, and the program can be viewed by going online to the IQS website, clicking "View" and then clicking "Source".

3. Request no. 7 - Mr. Meiresonne previously had turned over to us a copy of the 2002 Who's Who which had been in his possession. Please let me know if this is sufficient, or whether you believe there is any need for us to actually copy it.

4. Request no. 9 - Mr. Meiresonne informs me that Mr. Kezeli had nothing to do with setting up IQS.

As you know, we are standing on our other objections. With respect to your objections to our document requests:

1. Request no. 15 - your client is still searching for other responsive documents and produce them if found.

2. Request no. 17 - you produced responsive documents only with respect to Mr. Meiresonne's former territory and are otherwise standing on your objections.

3. Request nos. 25-27 - we are willing for now to limit the request to communications between November 1, 2002 and April 30, 2002 and limiting the topics of the communications to anything involving Industrial Quick Search, the current or future status of Meiresonne & Associates, Inc. as Senior of the territory, who might succeed Meiresonne & Associates, Inc. as Senior of the territory, the current or future employment of the third-party defendant and the terms of any such employment. However, we reserve our rights as to other time periods and topics.

4. Request nos. 33-36 - you will be producing documents of all payments made to Alexander, Gluchowski, Anderson and Tucker (or any corporation or other entity formed by any one or more of them) by either plaintiffs, Dave Herrendeen or Blueline Resources, LLC.

5. Request nos. 46-48 - after checking the pleadings, and specifically paragraph 208 and the twelfth counterclaim contained in our answer, we stand by the relevance of these requests.

6. Request no. 49 - I will withdraw the request if you give

a written representation that you are not claiming with respect any claim in your pleadings that the statements in the e-mail identified in paragraph 90 of the complaint is false.

7. Requests no. 52 and 53 - you were going to check with your clients.

As to the balance of your objections, we are unable to resolve them.

In terms of commencing depositions before resolution of all objections, we would like full compliance with our request nos. 15 (if there are any other responsive documents), and 25-27. With respect to those other items to which you asserted objections, we are willing, without waiving any of our rights, to at least commence depositions to see what information may develop from that discovery method.

Please also contact me about revising the discovery plan, since clearly depositions may not even commence, let alone be completed, prior to September 1.

Very Truly Yours,


Neil A. Miller

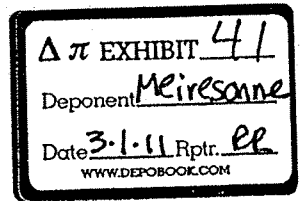
cc: Michael Meiresonne
(by fax, 616-285-3190)

Ronald M. Redick, Esq.
(by fax, 616-632-8003)

MILLER, ROSADO & ALGIOS, LLP
ATTORNEYS AT LAW
200 OLD COUNTRY ROAD
SUITE 590
MINEOLA, NEW YORK 11501

Louis Algios
Christopher Rosado
Neil A. Miller

(516) 512-0200
FAX: (516) 741-7758



July 31, 2003

BY FAX (616-285-3980)

Mike Meiresonne
Industrial Quick Search, Inc.
1500 East Beltline
Suite 265
Grand Rapids, Michigan 49506

Re: Thomas Pub. Co., et ano v. IQS, et al

Dear Mike:

As discussed today, enclosed are copies of Thomas' attorney's July 28, 2003 letter and my response thereto.

After further thought, while it is not a high priority item, I believe you should extend the information to show whether the IQS advertiser had advertised in the Thomas Register 2001 edition, at least for those advertisers who were signed up by IQS during the same time period that you were selling for the Thomas 2002 edition. In particular, I want to look at any advertisers who were "yes" for the Thomas 2001 edition, but "no" for the Thomas 2002 edition, but purchased IQS. Hopefully, there will be a minimum of such advertisers, or at least a dropout rate no greater than that experienced by Thomas overall. I want to refute any implication that, even for advertisers outside of your territory, Thomas lost any business as a result of IQS' activity.

If you feel differently, please let me know.

Cordially,

Neil A. Miller

Enc.



Patent Pending

INDUSTRIAL QUICK SEARCH

"The Engine Inside The Engine"

FAX TRANSMISSION

FAXED

Date: August 3, 2003

To: Neil Miller
Miller, Rosado, & Algios, LLP
1-516-741-7758

From: Mike Meiresonne

Total Pages: 5

- 1) I am not including the "keyword packet" document since it is proprietary and is on the computer even though it is used as a work sheet for every site.
- 2) I am not including the TR listing of companies since it is on the Internet and publicly available and we clicked on websites to get company info.
- 3) I received our latest postcard mailing-we have not created the next one- and you will see that we put on page two "why is there www.thomasb2b.com?" This will not happen again unless you approve and this little tag was put in by someone at the last minute. So I am sure we will hear about this and wanted to warn you now. You may want to let them know. We have had several phone calls and emails from Thomash2b soliciting us to advertise with them. We are thinking about running a small program. Agree?
- 4) I can do the list for 2001 TR advertisers-those sold in 2000 but IQS did not sell any advertising in the year 2000. I can still do but I wanted to make sure you understand if they bought IQS in 2001, they would not renew for the 2002 edition in 2001.

Let me know if you have any questions or concerns about the above.

Thanks

1500 East Beltline, Grand Rapids MI 49506
Phone 616-285-3129 Fax 616-285-3980

$\Delta \pi$ EXHIBIT <u>43</u>
Deponent <u>Meiresonne</u>
Date <u>3-1-11</u> Rptr. <u>UR</u>
WWW.DEROBOOK.COM

COPY



INDUSTRIAL QUICK SEARCH

"The Engine Inside The Engine"

Patent Pending

~~FAXED~~ FAX

TRANSMISSION

Date: December 9, 2003

To: Neil Miller From: Mike Meiresonne

Total Pages: 19

I talked to Sara Broene and I am suppose to talk with her tonite. She said she was subpeoned and also told me she was going to move out of state.

Lindsey left to go to class and I will discuss with her this am.

I am going to take 5 initial sites and have Nicole analyze the PDM compared to TR for all three sets of sites excluding the 4/2 group since we are using the 3/27 group. We will have the 2001 TR pages as proof.

Also, do we want to play my involvement as a partner in Colburn that is an advertising agency that placed close to \$125,000 in advertising based on Dave's email stating 35,000? Cardinal Aluminum, one of Colburn's clients, runs an insert. Since I am an owner, my business and I were deceived. This goes to the "disparaging" but true fax regarding the number of print sets. In addition, even now, one can order the 2003 set of Thomas Register. My new rep, John Donovan, ordered a set for free last week. This is bad in another vein.....the printed books but did not distribute all of them!

I have enclosed the Michigan law regarding withheld commissions.

In our reply, do we mention the huge payoffs given to Dave and the reps? Dave probably received 8 times his normal pay on an annualized basis.

To specifics:

TR reports: some of from our TR files...the one of Rivets for sure since we do not have a Rivet site. Some of the others are sent by advertisers. For instance, Gordon Brush sent me this report as well as his TR Internet Activity Report. I do receive these every so often.

Project Ajax is a project of not cleansing PDM but of taking companies off sites that these companies should not be on. It was started at the beginning of August 2003 and corroborated by Lisa's email. I see the term "cleansing" used for earlier info.

Glenn Moore's information has only to do with the database for MA's TR territory based on the data provided him....not relevant to IQS and was not national like IQS' database.

I think all of the documents regarding project ajax and "how to write copy" clearly show why we would not want to use TR's PDM. It goes contrary on how to develop rankings on a site.

Step 2 on Project Ajax discusses searching on Google and developing keyword density.

"How to write new copy" talks about "print source code" for key words. Under 4 "write descriptive text that reflects the products made by the company...be sure to focus on keywords from the design packet.....try to put 2 to 3 keywords per description.....be sure to incorporate singular and plural versions...the main goal is to get keywords throughout the text to get better rankings."

It goes contrary to what Lisa says and any copying we could have been doing from June 2002 on. So what would we be hiding? And since we write copy into a database all that really is in the files is the copy of websites that our pdm was based on. Reranks and Ranking reports have nothing to do with creating or maintaining the websites. We have the TR top 25 in another file and is reference material.

Who's who we need to mention is on the web in treczone and Senior's websites.

I have also enclosed some emails that indicated the TR reps were telling companies that we were soon going to be put out of business and I will send an email to Star Hydraulics regarding the TR rep calling us crooks.

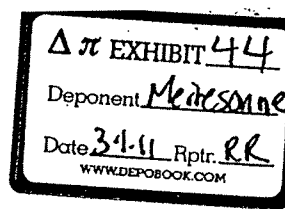
Seems clear why they wanted to delay Gennarro and take mine and Janet's dep so we would be at a decided disadvantage....also, regarding accounting, I wonder what Rittinger has up his sleeve?

Regarding reps, we have indications that Dave told everyone to slow down on selling TR when I was leaving to protect TR and provide better value to TR. I have several examples and also why we need to complete depositions.

Thanks



1500 East Beltline, Grand Rapids MI 49506
Phone 616-285-3129 Fax 616-285-3980



COPY



INDUSTRIAL QUICK SEARCH

"The Engine Inside The Engine"

Patent Pending

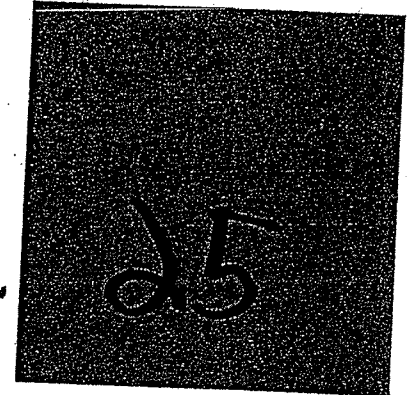
~~FAXED~~ FAX TRANSMISSION

Date: December 9, 2003

To: Neil Miller

From: Mike Meiresonne

Total Pages: 15



Here are our documents regarding Andy Alexander and search engine marketing.

I talked to my daughter Cassie and she told me most of the materials taken out of the files were ranking reports. We had started to save some but it became evident that there was too much. However, I started looking around the office and I found a file cabinet that has two full drawers of ranking reports. Each drawer is about 3 feet deep and has probably three individual months of ranking reports for most of our sites. These were reports from 2002, not 2003. I will save these just in case if you need to show the volume of these reports and why we could not continue to save all of them.

Thanks

$\Delta \pi$ EXHIBIT 45
Deponent Meiresonne
Date 3-1-11 Rptr. RR
WWW.DEPOBOOK.COM

COPY



INDUSTRIAL QUICK SEARCH

"The Engine Inside The Engine"

Patent Pending

~~PAID~~

FAX TRANSMISSION

Date: ~~December 9, 2003~~

To: Neil Miller

From: Mike Meiresonne

Total Pages: 14

Here are our documents regarding the various procedures....

Thanks

Project AJAX:

Step #2

Purification - An initialed checklist MUST be turned in with each site packet, upon completion.

1. Print Pages 1 & 2 and the Keyword Packet for the site you are working.
2. Use the Advertisers Spreadsheet to determine the advertisers and requests for both pages and mark on your copy.
3. Use the Rank Page, in SPIKE, to total the number of companies on the entire site. Enter this number on your checklist.
4. Use the Rank Page, in SPIKE, to mark the companies that are NoPg1 and move to their appropriate position on pg 2.
5. Examine each company listing:
 - a. Determine which site the company should be listed. You can look on the following pages:
 - Home
 - Products
 - About Us/Company ProfileIf the company does not have an information page specifically explaining what they do, call the company for clarification.
 - b. Mark the category or designation, on your site copy, that best defines what the company does:
 - MarketPlace – MKTPL – DO NOT LIST(DNL)
 - Manufacturer's Rep – MFGREP – DO NOT LIST – do make sure we have the companies the represent on our site.
 - Distributor – DIST – DO NOT LIST, unless Mike will allow Distributors on the site.
 - Design/Engineering Firms – DESENG – Listing these companies will be determined later.
 - c. Once the category, from the list above, has been determined you will need to mark the DNL companies appropriately in GoldMine History, Remove them from the site and remove all DNL or OFF site categories from GoldMine. Also, remove the Manufacturer's Rep records from GoldMine.
 - d. Companies without a category will be listed as manufacturers.

Be Sure to Document Your Changes in GoldMine!

If you want to determine the Keyword Density, on a site, you can use Google to search for specific Keywords or Keyword Phrases within your site:

Open the site in your browser.

Type in the Keyword in your Google search window.

Click the Search Site button on your Google Toolbar.

IF YOU HAVE ANY QUESTIONS PLEASE ASK!!!!!!!!!!!!!!!!!!!!!!

THANK YOU!

Project AJAX:
Step #2 – Checklist

- ☐ xPrint Pages 1 & 2 of the site. Sites will be assigned.
- ☐ Print Keyword Packet.
- ☐ Determine and Mark Advertisers and Requests on your copy.
- ☐ Mark NoPg1 Companies in SPIKE and Move to their appropriate position on pg 2.
- ☐ Examine Each Company Listing Marking their category on your copy and removing irrelevant site categories from their Record in GoldMine.
- ☐ Remove DNL companies from GoldMine and SPIKE.
- ☐ Remove Manufacturer's Rep Records from GoldMine.
- ☐ Make text revisions. (Don't forget to check the Rollovers from Pg1)
- ☐ Add the Total Number of Companies on the Site _____
- ☐ Turn in your packet, when completed.

Initials:_____

- ☐ Send E-Mail to Page 1 & Page 2

Initials:_____

Writing Text

At IQS our goal is to get companies to buy space on our websites. They will be more eager to do so if we can show them customer interest. As a text writer you are essentially an advocate of their company. Your primary goal is to get their company attention from potential customers.

▪ **Things to Include**

1. The entire company name, with the abbreviations spelled out, in the company field of the Production Database. Be sure to include trademarks, all capital letters and any other special traits of their company name. In the text of the company description you may leave abbreviations.
2. Registered trademark symbol, ®, when necessary. In the Production Database you will type a space, after the word you want the symbol to appear. Then you will type ®. This will convert to the ® symbol after you have entered the information.
3. Text variations:
Company Name is a supplier of
Company Name is a leading manufacturer of
Company Name is a provider of
Company Name is a designer and manufacturer of
Company Name specializes in
Company Name is a world-wide supplier of
Company Name produces
Company Name is a custom provider

You will want to occasionally change the structure of the first sentence. It does not always need to begin with the company name. In fact, the more variety, you include, the better.

Feel free to pull key information from the company's information pages like how long they have been open or the fact that they hold a patent on a product relating to your keywords.

- e.g. Since 1969, Company Name has been
For over a century, Company Name has been
At Company Name, we have been

You will also be able to include the industries that use this company's products.

- e.g. Company Name has been providing quality Keyword List, to the military and aerospace industries for over 50 years.

You may also attain variety with phrases containing like, such as and including.

4. You will want to use at least 3 keywords in each company description. Keep in mind, a keyword is an entire word or group of words found in the keyword packet or at the top of the first page on the site. Each keyword will fall between the commas.
5. You will want to keep the body of your text between 3 and 4 lines, in the Production Database.
6. Keep your descriptions honest and straight-forward. If a company does not manufacture a product, we cannot say they do.

Manufacturer – Someone who actually makes a product.

Distributor – Someone who sells the products someone else manufactures.

7. Try to hyphenate words like cost-efficient, high-quality and world-wide.
8. Use the singular and plural forms of the keywords to vary your text.

▪ **Things to Exclude**

1. Leave out the Inc.'s of the company name, in the text.
2. **Do Not**, under any circumstances, copy any sentence, from a company website, word for word. This could violate copyright laws.
3. **Do Not**, use /, & or any other symbols to take the place of words.
4. **Do Not**, put a comma before the and in the end of your word series.
5. Leave out the divisions of and affiliated with's in the Company Name Field of the Production Database. You can include these in the descriptive text.

Writing A New Site

■ Beginning

1. Get a new site packet from the top of the filing cabinet, located near the production room door. You will find the packets in a folder titled "New Sites To Do."
2. In the packet you will find:
 - a. Keyword Packet – A listing of the keywords, site heading and other technical information needed to produce the site. A Keyword is an entire word or group of words (see example).
 - b. Check existing companies in the database.
 - c. Thomas Register listing - The companies TR has listed in the top 25.
 - d. Get the top 50 companies in Google and MSN.
 - e. Check Globalspec and list any advertiser in category
3. Open your Internet Explorer.
4. Enter the site heading, from your keyword packet into the Google Tool Bar, located in the top left corner of your screen.
5. Print the first 25 companies. Compare to your list, if the Google companies do not appear on the TR list you will need to add them as well.
6. Type the first company name in the Google Tool Bar, located in the top left corner of your screen.
7. Click the Search Web Box.
8. Now you will be looking at a listing of sites that Google has found. If you do not see the company you are looking for follow the next steps.
 - a. Click the Advanced Search Heading.
 - b. Type in the company name or the company city in the Exact Phrase Box.
 - c. Click Search Web.
 - d. If this has still not narrowed your search enough go to the TR site.(ONLY AS A LAST RESORT!!!)
 - e. Type the company name in the Search Box.
 - f. Click Search.
 - g. Click the Company Name Heading to access the company information including the phone number and web URL, if available.

- f. Take all of your pages off the printer and staple them together.

▪ **Production Data Base/ Writing Your Text**

1. Open the Production Database, you will type <http://internal.industrialquicksearch.com> in the address bar at the top of our internet browser. Refer to your Production Database Instructions for further aid.
2. Click the Company Info Database and Select Add.
3. Type in the company's name, as it appears on their site excluding divisions and affiliated with's, into the Company Name field.
4. Type in the company's city and state into the Address Field.
5. Type in the company's phone number, using dashes, into the Phone Field.
e.g. 800-111-1111
6. You will need to Choose the Region the company is in, refer to your Regional Map.
7. If the company has submitted a specific description you will need to type YES in the Description Requested Field
8. Now you are ready to write your text in the Description Field, feel free to write it on paper first. There are a few key things to include when you are writing your text:
 - a. Your text should include 2-3 keywords. While Remaining True to the site. Using Unique products and items if available.
 - b. Vary the singular and plural of the keywords alternating company to company.
 - c. Your text must include the company's name.
 - d. Your text must be fairly interesting and descriptive. You may want to choose something from the company's website that they wanted people to know, like how long they have been open or specialty things they do, in addition to those pertaining to the site.
 - e. Try to vary your verbage from company to company, to break up the monotony. Start with the year they began or what industries they service. Try to write as if you were promoting this company alone and wanted to get them as much business as possible.
 - f. You must write the text as if you were from the company using "we" and "our".
 - g. Be sure to include proper punctuation, spelling, grammar, etc.
9. Choose your site category in the IQS site Field.

10. Choose the page this company will appear on in the Page Field.

▪ **Completion of New Site In The Production Database**

1. Click the ReRank and Page Generation Box on the top of your Production Database screen.
2. Click the Rank Box.
3. Select your site category from the list.
4. Click the Get Listing Box.
5. You will see a list of all the companies you have entered grouped by page #1 and page #2. In the Position Field of the page #1 companies you will enter the numerical order Mike wants them to appear.
6. Choose the companies status.
 - a. Free Trial – The companies we have chosen to list on our site.
 - b. No Page 1 – Companies that we will not list on Page 1.
7. When you have completed numbering all 15 companies on page #1 click the Enter Information box at the bottom of the page.
8. Click on the Back to Rank Select link. Once again, click the highlight your website and click on the Get Listing box again.
9. Now you will follow 5-9 for the page #2 companies, starting from #1. Note: the TR sites will be given the numbers 99, 98 etc. so that they will appear at the bottom of the page.
10. When you have finished numbering the free trials you will need to change the No Page 1's, the TR hosted and branded and the TR sites to the next consecutive numbers in the group.
11. Click the Enter Information box.
12. You have completed the Production Database portion of writing a new site.

Listing Change Instructions

1. To do a listing change, you must first know how to access and navigate both Goldmine and the Production Database. If you have questions regarding Goldmine or the Production Database, please refer back to your Goldmine Instructions and the Production Database Instructions.
2. All of the listing changes are held in a pile organizer on top of the New Prelim Filing Cabinet. It is clearly marked as such. Take one or if there is a pile, take however many you need or want to do.
3. You will then proceed to do what is requested on the sheet of paper. Most are description changes, updating Goldmine information, or adding a company to Goldmine and the Production Database. Most listing changes are assigned by Mike and he will mark them with an "L" if there is a change to the actual listing and a "D" for data or update information.
4. It is often helpful to research the company in Goldmine to familiarize yourself with the company and the correspondence that has lead to the listing change. Sometimes you may need to research the listing change in Goldmine to simply find out what the company name is or which site the listing change pertains to. Either way, Goldmine can be a very instrumental tool in completing listing changes even when there is no change needed in Goldmine.
5. Occasionally there will be a listing change that requires work to be done on the Preview/Rollover Ad. In this case, make all possible editorial changes and highlight the information that is to be used by the Production Staff to make the requested changes to the Rollover Ad. Please make sure that the instructions are clear and easy to read. If you find it helpful, make a note for the Production Staff so that they know exactly what is to be done with the listing change.
6. If you have questions, Sara can assist you or you can ask the person that put the listing change in the box.

Example:

The piece of paper says something along the lines of "Our listing is totally incorrect, please change the description to read.....", this is a listing change in which they are requesting specific text to be used. Change their text in the Production Database to read as closely as possible to what they wrote. Occasionally you will have to shorten the text to the 30 word or four line limitations. In this case, use as much of the product or services information as possible.

The piece of paper has an address, phone number, e-mail addresses and there is the word update written on it somewhere, this is to update the Goldmine information. Simply

go into Goldmine and find the company's contact record. You will then proceed to update the information as it appears on the paper.

The piece of paper is an e-mail and includes new descriptive text and a city and state update. This would be an example of updating information in both Goldmine and the Production Database. You may go about this in any order that is comfortable to you. You may fix the Goldmine information first and then move on to the Production Database information or vice versa. Make sure however, that you make all necessary changes before turning it in for regeneration or before giving the papers back to Mike.

Suggest A Company Processing

■ Form Retrieval

1. Open the E-Mail from the company.
2. Print the E-Mail.
3. Link the E-Mail. If the company is out of the country, just link it to your GoldMine File. We will not be adding them to the site or creating a company file. File the printed copy in the SAC File.
 - a. Click the Re-Link Field at the top of your E-Mail Center Toolbar.
 - b. Click the Link Another Contact Field.
 - c. Check the Find An Existing Contact Box, to first see if the company is in GoldMine.
 - d. Be sure to uncheck the Link/Unlink Box before you click O.K.
 - e. Look for the Company.
 - f. If the company does not exist in GoldMine close the box.
 - g. Follow steps a and b.
 - h. Check the Create a New Contact Box.
 - i. Follow step d.
 - j. The company E-Mail address will now be in the contact field.
4. Fast File the E-Mail.
5. Look up the Company E-Mail address in the contact field.
6. Fill out the company information in GoldMine. You may need to enter the web address and launch the web site to access the information you will need.
7. You will be placing the company on page 2 of the site.
8. Add the company to the Production Data Base. You will want to see if the company is already on the site first.
9. Put Yes in the Description Requested Box.
10. Turn the Request in to the Production Department. Keep a copy in SAC File.

■ Completion After Upload

1. Send out Information E-Mail, only to those companies requesting more information. {
2. Set a pending call for Janet or Mike, depending on who works the site.
 - a. Click the Pending Tab on the bottom half of the company file.
 - b. Right click your mouse in the Pending Box.
 - c. Hi-light the Schedule Field.
 - d. Hi-light the Call Field.
 - e. In the code Box you will choose the SCP field.
 - f. In the Primary User Box you will choose Janet or Mike.
 - g. In the Reference box you will type the site they requested.

▪ Gold Mine

1. Open Gold Mine.
2. Search in the "Lookup" field by "Company" and then type the Company's name in the Field to the right to see if the company already has a record in Goldmine. You may also want to search by city or phone number. If the company exists, skip to step 14 and be sure to check the phone number.
3. If the company does not exist click the New Icon in the upper left corner of the screen. You will not be adding Overseas, Mexican or companies with no websites (be sure you have called first).
4. Type in the company name, as it appears on their website, into the Company Field.
5. Type in the contact name into the Contact Field. If there was no contact on the website you will need to call the company and follow the Calling For Contact Name instructions.
6. Type the company phone number you used in the Production Database into the Phone Number Field.
7. Type the company contact's E-Mail address into the E-Mail Field.
8. Type the company website into the Web Site Field. You will then have to edit the web address to enter the URL in the notes field. Click on the Details Tab in the lower portion of your company Information screen. Double click the web address. Enter the TR web address. Click OK.
9. Click OK.
10. Type the contact's title into the Title Field.
11. Type any other phone numbers into the Phone #2 and Phone #3 Fields.
12. Type the fax number into the Fax Number Field.
13. Type the company address into the Address Field in all caps and using the Post Office Abbreviations list. If they have a PO Box use that instead of the physical address.
14. If the company is a distributor you will need to choose Distributor in the Type Field.