

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

$\Delta \pi$ EXHIBIT 26
 Deponent Meiresonne
 Date 3-1-03 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

Attachment:

Attachment:

Attachment:

Composing a message

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Deponent **Meiresonne**
Date **3-1-11** Rptr. **ll**
WWW.DEPOBOOK.COM

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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

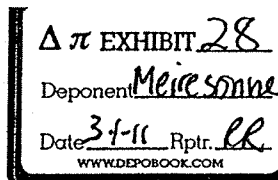
SUBJECT: document production & interrogatories

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	

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Subject : response to your recent e-mails & fax
 Date : Wed, 7 May 2003 12:53:00 -0400
 Linked to: Neil Miller
 From : "Neil Miller" <nmliller@mralaw.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

Address Book Send

$\Delta \pi$ EXHIBIT 29
 Deponent Meisone
 Date 3-1-11 Rpt. rd
 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

- Attachment: Browse
- Attachment: Browse
- Attachment: 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 & ALGIO 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 30
Deponent Meiresonne
Date 3-1-11 Rptr CL
WWW.DEPOBOOK.COM

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 black 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.

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COMM.RESULT = OK
PAGES = 03
FILE NO. =
DURATION = 00:01'17
MODE = XMT
STATION NAME =
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RECEIVED ID =
RESOLUTION = STANDARD

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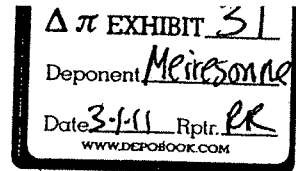
MILLER ROSADO & ALGIOS, LLP
ATTORNEYS AT LAW

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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,



Neil A. Miller

Enc.

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
Street Address STE 590
200 OLD COUNTRY RD

City MINEOLA NY 11501
Sent by (Name/Dept) CHRISTOPHER KOJAKO, AQ
516-512-0200

TO (Company) PLEASE PRINT NEATLY
Industrial Quick Search Inc.
Street Address 1500 EAST BELTZING STE 265

City GAITHERSBURG MD
Attention: (Name/Dept) MIKE HEISELSONNE
Description

Sender's Signature Date Airborne Signature Date
Mike Heiselsonne 6/17/03

3 Payment Sender will be billed unless marked otherwise
Receiver 3rd Party
 Receiver 3rd Party

4 Billing Reference (will appear on invoice)
Industrial Quick

5 # of Pkgs 1
6 Weight (LBS) 1
7 Packaging One box must be checked
 Loose Express Pack Other Packaging

Special Instructions
 Saturday Delivery Extra charge Express only Not available to all locations
 Lab Pack Service
Declared Value or Asset Protection Shipment Valuation \$.00

Thank You for Shipping with Airborne!

4 Service Type
One box must be checked. Assured Express must be selected.
10:30 A.M. Extra charge.

Next Airborne over 6 lbs charged at the Express rate.

*Service may vary by destination. visit www.airborne.com

ABSENT 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-APFB FED ID. NO. 01-0837490

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1-800-247-2876

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Next Airborne (Letter - 5 lbs)

Second Day (Letter - 150 lbs)

SENDER'S COPY

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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 depts 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...

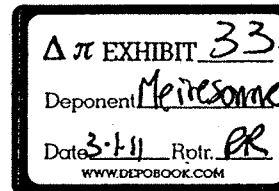
Mike Meiresonne
 Industrial Quick Search, Inc.
 1500 East Beltline Suite 265
 Grand Rapids, MI. 49506
 Phone: 877-977-5377
 Fax: 616-285-3980
 www.industrialquicksearch.com
 mikem@industrialquicksearch.com

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

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Copy to...	Move to...	Redirect to...
<input type="text"/>		<input type="text"/>
<input type="button" value="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.

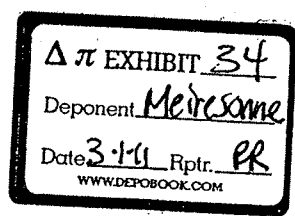
I will keep you abreast of all developments. If I do not speak to you beforehand, enjoy the upcoming holiday weekend.

Cordially,


Neil A. Miller

Enc.

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 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 cursive script, appearing to read "Neil A. Miller", with a long horizontal flourish 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.sbb.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.

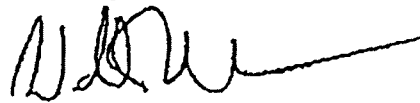
As for defendants' Response, as a general matter, please confirm that defendants have not withheld documents where they produced documents subject to objections. With respect to defendants' specific objections, plaintiffs are willing to limit Document Request No. 2 to persons who during their employment 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

Δ π EXHIBIT 35
Deponent Meiresonne
Date 3-1-11 Rptr. ek
WWW.DEPOBOOK.COM

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

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

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