

Hank Burgoyne

From: Jason Singleton [lawgroup@sbcglobal.net]
Sent: Wednesday, April 18, 2007 10:51 AM
To: Hank Burgoyne
Subject: Re: Joint Letter to the Court

It looks like we are unable to reach agreement on a joint letter. I think it is important for the court to know that there are specific areas of dispute on particular and discreet demands for discovery. Consequently, I will modify my letter to explain agreement could not be reached, and submit mine separately. I may also ask the court for leave to file a motion to compel. You are free to do the same. Have a great day,

Jason.

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

From: Hank Burgoyne
To: 'Jason Singleton'
Cc: 'Jeff Rosenfeld'
Sent: Tuesday, April 17, 2007 7:33 PM
Subject: Joint Letter to the Court

Hi Jason,

Attached is a revised version of your joint letter to the Court concerning the parties' March 20 in camera meet and confer.

Suffice it to say that your draft was entirely unacceptable, less because of its abundant spelling and grammatical errors than because of its obvious omissions and its fixation on the minutiae of the parties' written discovery. Did the Judge say something suggesting he was more concerned with the parties' individual written discovery requests than with, say, the parties' agreement to file cross-motions for summary judgment or the parties' resolution of the deposition issue as to which Plaintiff had filed its motion to compel?

Azoogole will continue to oppose your transparent attempts to fabricate a record of Azoogole's supposed discovery malfeasance, whatever form they may take.

Thanks, and best,

Hank Burgoyne

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