

**Jerrie Hayes**

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**From:** Bob [bob@pickle-publishing.com]  
**Sent:** Monday, January 07, 2008 1:19 PM  
**To:** Jerrie Hayes  
**Cc:** Lizette Richards  
**Subject:** Re: Discovery Conference on Thursday, January 10, 2008, at 10 am

Ms. Hayes:

I am in receipt of your letter of today regarding my request for a discovery conference before our filing of an appropriate motion "if the plaintiffs are taking the position that everything is a trade secret or confidential," or "if for some reason their response [to my requests] to produce is not going to be timely," or "if objection is going to be made to the larger portion of my requests." Thursday, January 10, 2008, at 10 am Central Time sounds good to me.

One thing that would be quite helpful in preparation for the discovery conference would be the expeditious sending my way of plaintiff 3ABN's response. It would give me some sort of idea what and how many disagreements exist. I would rather not try to transcribe their response from you during the conference, and we really need their formal response in writing from them.

You write,

"Since there appears to be some sort of dispute concerning Plaintiffs' responses and the various documents to be produced in response to your requests ...."

Since to my knowledge neither plaintiff has to date sent me a response for me to have a dispute over, are you saying that 3ABN and Danny Shelton have a dispute between themselves regarding what sort of response they should give? If so, I would hope they could get their disagreement taken care of before we have our discovery conference. But regardless, we'll make the best of the situation that we can.

Inasmuch as Thursday, January 10, 2008, marks the 34th day since I served my requests to produce on Danny Shelton, in the interest of efficiency I would suggest that we expand our discovery conference to include my requests to produce to Danny Shelton, if his response or lack thereof fits the conditions I based my request for a discovery conference upon.

Sincerely,

Bob Pickle, *pro se*

5/22/2008

