Jerrie Hayes

From: Jerrie Hayes
Sent: Monday, January 07, 2008 1:44 PM
To: 'Bob'
Cc: Lizette Richards
Subject: RE: Discovery Conference on Thursday, January 10, 2008, at 10 am

Mr. Pickle;

Thank you for confirming that Thursday at 10:00 a.m. will work for our conference call. I will plan to be in my office at that time and will await your call at my direct dial number, 612-337-6142. Copies of Plaintiffs' responses to your requests will be served upon you prior to the conference. While the only dispute currently on the agenda is the timeliness of those responses, I suspect we will have more to discuss when you have received and reviewed Plaintiffs' responses. If you would like to add any other discovery disputes to Thursday's agenda, I'd ask simply that you'd notify me (by e-mail is fine) prior to the conference call on Thursday morning.

On a related note, I received an email from Defendant Joy that 10:00 on Thursday will work for him. Please advise if you know why Gailon Joy intends to participate in a discovery conference concerning discovery requests that were not posited by the Defendants jointly, but by you individually.

Sincerely;

Jerrie M. Hayes

From: Bob [mailto: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*