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M. Gregory Simpson 612-337-6107 gregsimpson@sbgdf.com

June 11, 2008

VIA FACSIMILE AND U.S. MAIL- CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Robert Pickle 1354 County Highway 21 Halstad, MN 56548

> Re: Three Angels Broadcasting Network, Inc. and Danny Lee Shelton vs.

Gailon Arthur Joy and Robert Pickle Court Docket No. 07-40098-FDS Our File No. 24,681-D-002

Dear Mr. Pickle:

I have received Defendants' Motion to Extend all Deadlines for Discovery. In your Affidavit you state as follows:

- 14. The Defendants conferred with Plaintiffs' counsel on June 4 and 5, 2008, and Plaintiffs' counsel agreed that a 90-day extension of all discovery deadlines was both reasonable and acceptable. The plan was that the parties would stipulate to such an extension, in exchange for Defendant Pickle's agreement to table his Motion to Compel.
- 15. Plaintiffs' counsel offering to draft the stipulation, but the Defendants have not yet received that draft, though it was promised on June 5 that it would be faxed on June 6.

As you know, I had agreed to draft a stipulated order to extend discovery 90 days. I had told you that I would get the order to you by the "close of business" on Friday, June 6, 2008. At approximately 4:56 p.m. on Friday, June 6, you called me and asked where the stipulation to extend discovery was. I advised you that it was in the fax machine being faxed to you. For good measure, I also mailed you a copy so that there could be no question that you received it. You never called to say you didn't receive the document. I enclose another copy.

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Your statement quoted above is therefore false. You have brought a motion asking the Court to do something to which I had already stipulated.

The problem with your conduct is twofold. First, you have lied to the court. Perjury is a very serious offense. You should think long and hard about whether you want to withdraw the affidavit or at least file a correction.

Second, I now have to respond to the numerous false and misleading assertions in your motion, even though I agree that the discovery deadline should be extended.

Therefore, it is my intention to ask the Court to award my client \$500.00 as a sanction against you for filing your motion when you knew perfectly well that I had already stipulated to it. You can avoid that result if you withdraw your motion and file the stipulated order that we previously agreed to. If you do not do so within one week from this letter, I will file my opposition and advise the Court about the facts in this letter.

Sincerely,

M. Gregory Simpson

MGS/ad Enclosure