

EXHIBIT A

Toth, Brian W (MIA - X27510)

From: Toth, Brian W (MIA - X27510)
Sent: Thursday, April 23, 2015 2:25 PM
To: 'Larry Klayman'
Cc: 'daj142182@gmail.com'; 'nmahboobian@gmail.com'; 'Handman, Laura'; Ratner, Micah; Bohrer, Sandy (MIA - X27678); Starling, Elaine (MIA - X27483)
Subject: RE: Initial Disclosures - Montgomery v. Risen et. al
Attachments: Montgomery v. Risen et al.

Good afternoon, Mr. Klayman:

We received your voicemail. We respectfully disagree with your interpretation of the Court's order, and we will be proceeding as set forth in my e-mail to you of April 21, 2015 (attached).

Additionally, the joint scheduling report is not due tomorrow. Instead, it is due May 1, as calculated in accordance with paragraph 3 of the Court's April 1, 2015, order. ECF No. 16. We look forward to receiving a draft from you promptly. If you would prefer that we circulate a draft report, please let us know.

Finally, should the court schedule a conference on this or anything else, we would make ourselves available.

Regards,

Brian Toth | Holland & Knight

Associate

701 Brickell Avenue, Suite 3300 | Miami FL 33131

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From: Larry Klayman [mailto:leklayman@gmail.com]
Sent: Thursday, April 23, 2015 12:02 PM
To: Bohrer, Sandy (MIA - X27678); Toth, Brian W (MIA - X27510); Starling, Elaine (MIA - X27483); Dina James; Naveed Mahboobian
Subject: Re: Initial Disclosures - Montgomery v. Risen et. al

On Thu, Apr 23, 2015 at 9:01 AM, Larry Klayman <leklayman@gmail.com> wrote:

Gentlemen:

You reading of the rules is incorrect. Docs must be produced by both sides tomorrow latest.

And, a report must be jointly prepared and filed by cob tomorrow.

I called to discuss.

Larry Klayman

Toth, Brian W (MIA - X27510)

From: Toth, Brian W (MIA - X27510)
Sent: Tuesday, April 21, 2015 3:29 PM
To: 'leklayman@gmail.com'
Cc: Handman, Laura; 'Ratner, Micah'; Bohrer, Sandy (MIA - X27678)
Subject: Montgomery v. Risen et al.

Good afternoon, Mr. Klayman,

We're writing regarding Judge Martinez's April 1, 2014, order, which, among other things, states that the parties, at the parties' scheduling conference, will "exchange documents and witness lists in compliance with Local Rules [sic] 16.1B." We agreed to do so by April 24, 2015.

On further review, we noticed that there is no such local rule (we suspect, based on the comments to Local Rule 16.1, that the local rule was amended). Accordingly, we will serve our initial disclosures on April 24, 2015, which, among other things, will contain, as permitted by Rule 26(a)(i)(A)(ii), "a description by category and location" of all documents that the disclosing parties have in their possession, custody, or control and that they may use to support their defenses, unless the use would be solely for impeachment. We will not produce any documents on April 24, 2015.

Regards,

Brian Toth | Holland & Knight

Associate

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