



Tuesday, February 17, 2015

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**Re: Golden Rule Letter – Alexander et. al v. BF Labs, Inc.,  
D. Kan. Case No. 2:14-CV-02159**

Gentlemen:

Plaintiffs' First Interrogatories and First Requests for Production of Documents were served on Defendant BF Labs, Inc. ("BFL") on August 18, 2014. BFL's responses were due no later than September 22, 2014. Although on September 18, 2014 the U.S. District Court for the Western District of Missouri stayed all actions against BFL, such stay was lifted on December 23, 2014.

We understand that BFL was not able to immediately provide discovery responses after the stay was lifted for various reasons, including that the Temporary Receiver was still in the process of returning possession of discovery materials to BFL. Given these unusual circumstances, we also understand that BFL's deadline to provide discovery responses was not clear.

Nevertheless, we have already had several email exchanges and phone calls regarding the circumstances and BFL's discovery responses, including the importance of Plaintiffs receiving BFL's discovery responses prior to the mediation scheduled on February 26, 2015. Although BFL has promised that discovery responses would be forthcoming for several weeks now, to date, we have not received any discovery responses from BFL.

Although we have attempted to be patient and work with you in order to avoid court involvement, we are required by local rules (and the amended scheduling order) to file a motion to compel no later than 30 days after BFL defaulted on its discovery responses. Given the circumstances, we think it would be reasonable for the court to conclude BFL's discovery responses were due on January 22, 2015—i.e., 30 days after the stay was lifted. As such, pursuant to local rules (and the amended scheduling order), we are required to file a motion to compel no later than February 21, 2015.

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Please provide BFL's discovery responses no later than February 20, 2015. If discovery responses are not received by then, we will file a motion to compel on February 21, 2015.

Should you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Ari N. Rodopoulos". The signature is fluid and cursive, with a large initial "A" and a long, sweeping underline.

Ari N. Rodopoulos  
Attorney at Law

ANR:tr