

From: Shellie McGaughey [<mailto:Shellie@mcbdlaw.com>]
Sent: Friday, June 20, 2014 5:35 PM
To: Park, Brian C.
Subject: Re: Atigeo v. Montgomery

I am pretty sure Mr. Montgomery will want you to file the non-suit which will of course be granted as a matter of right. I will discuss with Mr. Montgomery though.

Sent from my iPhone

On Jun 20, 2014, at 5:10 PM, "Park, Brian C." <BCPARK@stoel.com> wrote:

OK, thanks for your e-mail. I will be traveling out of the office next week, but I do not think we need a phone call any more in light of the below. Just let us know if your clients will stipulate -- otherwise, we can just file on our own.

From: Shellie McGaughey [<mailto:Shellie@mcbdlaw.com>]
Sent: Friday, June 20, 2014 5:07 PM
To: Park, Brian C.
Cc: Roland Tellis; Park, Brian C.
Subject: Re: Atigeo v. Montgomery

Brian I will be available next Friday for a phone call. So sorry missed today.

Sent from my iPhone

On Jun 20, 2014, at 3:58 PM, "Park, Brian C." <BCPARK@stoel.com> wrote:

Shellie:

We were not able to connect on the phone today, so we thought we would send you an e-mail instead. Our clients have been thinking about the litigation in light of the larger context you shared with us recently. We understand Mr. Montgomery has suffered one or more brain aneurisms requiring multiple brain surgeries and that he has been in Swedish hospital trying to recover from blindness in one eye and partial paralysis. We have also reviewed the document production from Istvan Burgyan, which indicates that he and his family have been going through some additional hardships. In the big picture, it is not Plaintiffs' desire to "pile on" the issues the Montgomery/Burgyan family is dealing with, particularly when Defendants have voluntarily taken down the websites that are the subject of the action. Meanwhile, the litigation continues though it ultimately may not be necessary in light of the status quo and these bigger issues. For those reasons, Plaintiffs contemplate filing a voluntary dismissal without prejudice. We assume your clients have no objection. We wanted to give you a courtesy heads up and to see if you are available next week to review the proposed stipulation. Just let us know.

Best regards,
Brian

From: Park, Brian C.
Sent: Friday, June 20, 2014 3:06 PM
To: Shellie McGaughey

Cc: Roland Tellis; Park, Brian C.
Subject: RE: Atigeo v. Montgomery

Is this time still good for you?

From: Park, Brian C.
Sent: Thursday, June 19, 2014 5:26 PM
To: Shellie McGaughey
Cc: Roland Tellis; Park, Brian C.
Subject: RE: Atigeo v. Montgomery

OK, that works.

From: Shellie McGaughey [<mailto:Shellie@mcbdlaw.com>]
Sent: Thursday, June 19, 2014 5:18 PM
To: Park, Brian C.
Subject: Re: Atigeo v. Montgomery

I will ca you at. 3 and we can link in Roland.

Sent from my iPhone

On Jun 19, 2014, at 5:09 PM, "Park, Brian C." <BCPARK@stoel.com> wrote:

(Vegas, I'm envious.) OK, how about 2:00 or 3:00 pm PDT tomorrow for a brief discussion? We wanted to circle-back with you about some of the big picture information you shared with us.

From: Shellie McGaughey [<mailto:Shellie@mcbdlaw.com>]
Sent: Thursday, June 19, 2014 5:01 PM
To: Park, Brian C.
Subject: RE: Atigeo v. Montgomery

Brian, I am in Vegas right now for a CLE. Home tomorrow night but trial starting Monday. I might be able to break away tomorrow afternoon.

I am checking on your request for Mr. Shockley's contact information.

Do you have a date for Edra's deposition?

When my trial is over I will want to proceed with several depositions.

So, yes I can find some time tomorrow but let me know what the issues are as I am remote and out of town.

Shellie

From: Park, Brian C. [BCPARK@stoel.com]
Sent: Thursday, June 19, 2014 4:56 PM
To: Shellie McGaughey

Cc: Roland Tellis; Park, Brian C.
Subject: Atigeo v. Montgomery

Hi Shellie:

How is your schedule tomorrow to touch base with Roland and me? Are you available at 10:00 AM?

Best regards,
Brian

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