

**From:** Katie DeVoe [<mailto:Katie@mcbdlaw.com>]  
**Sent:** Thursday, May 29, 2014 12:33 PM  
**To:** Park, Brian C.; Shellie McGaughey; Peter Nierman; Paul Brain; Jill Davenport  
**Subject:** Atigeo v. Montgomery, et al.

Mr. Park,

Attached please find correspondence from Ms. McGaughey this date. A hard copy will follow via legal messenger.

Thank you,

Katie DeVoe  
Paralegal  
325 – 118th Avenue Southeast  
Suite #209  
Bellevue WA. 98005  
Phone: 425-462-4000  
Fax: 425-637-9638



McGAUGHEY BRIDGES DUNLAP PLLC  
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May 29, 2014

Via E-mail followed by Legal Messenger

Brian C. Park  
Stoel Rives LLP  
600 University Street, Suite 3600  
Seattle, WA 98101

Re: *Atigeo, LLC & Michael Sandoval v. Dennis Montgomery and Istvan Burgyan*  
Western Washington District Court Cause # 2:13-cv-01694

Dear Brian:

Thank you for your email yesterday regarding the depositions of Istvan, Christopher Shockey and Edra Blixeth. As you know, my client has been very ill. When we last actually spoke Mr. Montgomery was headed for surgery. I wanted to update you on what his health condition currently is and the update I received yesterday.

On May 14, 2014, Dennis had brain surgery/procedure to address a brain aneurysm. While in ICU he had a stroke and required another surgery on May 16. Unfortunately he had another stroke on May 18 and is currently blind in his left eye and cannot move his left arm or leg. We have been advised that he will likely be in the neuro rehab unit of Swedish Hospital for maybe a month. I am going to try to visit him in the next couple of days and will provide you a more detailed update then.

I have been reluctant to suggest a discovery stay but wanted to alert you to my client's pending health issues. This has affected our ability to travel to California to look for responsive documents concerning Demaratech, LLC. While we had plans for Mr. Burgyan to visit California that has been put on hold to address and allow Istvan to assist Mr. Montgomery and his immediate family in fighting his serious health issues. I will update you as to his condition in the next few days. I have asked for permission to interface with Mr. Montgomery's doctor and hope to have a more detailed status shortly.

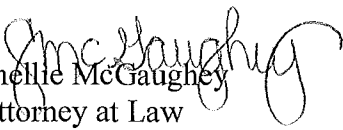
While we have tried to get Istvan to commit to a date to travel to California so that we can proceed in your request for his deposition Mr. Burgyan has stated that given the severity of Dennis' current condition he cannot leave the area right now.

Brian Park  
May 29, 2014  
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I am sure you share our wish for Mr. Montgomery's speedy recovery. I wanted to alert you to this grave situation. Please feel free to call me or I will contact you as soon as I have an update.

Very truly yours,

McGAUGHEY BRIDGES DUNLAP, PLLC

  
Shellee McGaughey  
Attorney at Law

cc: Paul Brain (via e-mail only)  
Debbie Roy (via e-mail only; Claim No. 47-24Q1-528)  
Cynthia Salvador (via e-mail only; Claim No. 47-24Q1-528)