
From: Roland Tellis <rtellis@baronbudd.com>
Sent: Friday, March 28, 2014 3:47 PM
To: Park, Brian C.; 'Shellie McGaughey'; 'Peter Nierman'; 'Katie Berry'
Cc: Norton, Maren R.; Ferguson, Hunter O.
Subject: RE: Atigeo v. Montgomery
Attachments: PLTFS 0001 - PLTFS 0212.pdf

Shellie, attached are the Network Solutions documents.



Roland Tellis | Shareholder | Baron & Budd, PC
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From: Roland Tellis
Sent: Thursday, March 27, 2014 6:39 PM
To: 'Park, Brian C.'; Shellie McGaughey; Peter Nierman; Katie Berry
Cc: Norton, Maren R.; Ferguson, Hunter O.
Subject: RE: Atigeo v. Montgomery

Shellie, thanks for your letter. We are troubled by your suggestion (perhaps inadvertently) that the Network Solutions documents were somehow withheld from you by my clients. Surely you understand that the documents in questions are in *your clients'* possession, custody or control and should have been produced to us by *your clients*. Indeed, though we obtained them from Network Solutions by subpoena, your clients could have, and should have, obtained them from Network Solutions with a simple telephone call at the outset of this case. Indeed, Brian has mentioned these documents to you in prior communications and we're surprised that you did not ask your clients to provide them to you then. In that regard, there has been no withholding of documents by my clients. I can't say the same for yours.

In any event, as you know, my clients' responses to your document requests are not due until next week. Nevertheless, pursuant to your letter request, I will have my paralegal Bates number the documents tomorrow and we'll email them to you.

Thanks,



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From: Park, Brian C. [<mailto:BCPARK@stoel.com>]
Sent: Thursday, March 27, 2014 6:20 PM
To: Shellie McGaughey; Peter Nierman; Katie Berry
Cc: Roland Tellis; Norton, Maren R.; Ferguson, Hunter O.; Park, Brian C.
Subject: RE: Atigeo v. Montgomery

Shellie and Peter:

Thank you for your letter. Roland is handing this, but the answer to your request is *yes*.

Best regards,
Brian

From: Katie Berry [<mailto:Katie@mcbdlaw.com>]
Sent: Thursday, March 27, 2014 4:31 PM
To: Park, Brian C.; Shellie McGaughey; Peter Nierman
Cc: Norton, Maren R.; Ferguson, Hunter O.
Subject: Atigeo v. Montgomery

Mr. Park,

Attached please find correspondence from Mr. Nierman 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



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