

From: Krueger, George J.
To: [Mitchell Stein](#)
Cc: [Berkley, Brian A.](#); [Sobol, Alexandra L.](#)
Subject: RE: replies to your emails re: discovery and settlement - response sought
Date: Tuesday, May 2, 2017 9:41:28 AM

Mitch:

Read the email...it will only take a minute... **The best thing that can happen for Dickens is a quick settlement.** It can't do any better than what is now offered. We both know that. I am free before noon today to discuss it.

-----Original Message-----

From: Mitchell Stein [REDACTED]
Sent: Tuesday, May 02, 2017 9:36 AM
To: Krueger, George J. <GKrueger@foxrothschild.com>
Cc: Berkley, Brian A. <bberkley@foxrothschild.com>; Sobol, Alexandra L. <asobol@foxrothschild.com>
Subject: Re: replies to your emails re: discovery and settlement - response sought

G:

B4 I even read the below, I will call you later this morning to avoid self-serving emails George, but YOU sent me them leaving no option but to respond in writing...

M

Confidential
From iPhone

> On May 2, 2017, at 9:16 AM, Krueger, George J. <GKrueger@foxrothschild.com> wrote:
>
>
>
> Mitch,
>
> I received your two (attached) emails last evening. I would rather have spoken to you, per my text yesterday afternoon in which I asked you to call me, rather than receive back to back self-serving emails.
>
> That said, let me respond to your emails in the order in which they were received and provide my views about the case, which we should try to settle:
>
> 1. Your email of 9:21 PM represents an abdication of your role as counsel to Dickens, a sophisticated, deep pocket party who has repeatedly stated that it has millions of dollars to spend on this litigation. Your email purports to "adopt" the improper, uncounseled position of Mr. Chou regarding Hallmark's discovery responses and ignores the real effort required to resolve disputes under the Court's "meet and confer" discovery requirements.
>
> More specifically, your email purports to adopt Mr. Chou's 5/1 email which claims that Hallmark has produced only 1% of what Dickens seeks in discovery. Mr. Chou has no basis to make this claim, which is absolutely false. Because he is not a lawyer, Mr. Chou does not understand the nature of Hallmark's on-going "rolling production" or the role of objections in discovery. He apparently has not bothered to read the transcript of the Court proceedings which he attended and has refused for weeks to authorize you to sign a confidentiality agreement which we provided to you. Moreover, neither you nor Mr. Chou have ever identified what specific deficiencies purport to exist in Hallmark's production or any facts to support Dickens' claim of a deficiency. Without this information, I cannot address your concerns with Hallmark. If Dickens is interested in an orderly resolution of the parties' disputes, Mr. Chou should defer to you and stop "playing lawyer". He faces consequences if he usurps the role of counsel and continues to vexatiously multiply the proceedings.

>

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> <Hallmark v. Dickens.eml>

> <FW: Delivery of Dickens Requested Hallmark Records.eml>

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