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6  
 7 **UNITED STATES DISTRICT COURT**  
 8 **DISTRICT OF ARIZONA**

9 JENNA MASSOLI p/k/a JENNA JAMESON,  
 10  
 Plaintiff,

CV 05-0854 PHX EHC

11 v.

**ATTORNEY'S CERTIFICATE OF  
 COMPLIANCE WITH  
 LRCiv 83.3(b)(2)(A)**

12 "REGAN MEDIA," JUDITH REGAN, as an  
 individual,

13 Defendant.

*(Assigned to the Honorable  
 Earl H. Carroll)*

14 REGAN MEDIA, INC., a New York corporation,  
 and JUDITH REGAN, an individual,

15 Defendants/Counterclaimants,

16 v.

17 JENNA MASSOLI, p/k/a JENNA JAMESON, an  
 individual,

18 Plaintiff/Counterdefendant,

19 and

20 JAY GRDINA, an individual,

21 Third-Party Counterdefendant,

22 and

23 DOLCE AMORE, INC., a Colorado corporation,

24 Counterdefendant.  
 25  
 26

1 Pursuant to LRCiv 83.3(b)(2)(A), Rules of Practice of the United States District Court  
2 for the District of Arizona, attorney Roger W. Hall of the firm of Renaud Cook Drury  
3 Mesaros, PA (“RCDM” or the “firm”) hereby certifies that on June 24, 2005, attorney Gary  
4 Crandell, Esq., of Denver, Colorado, longtime transactional counsel for  
5 plaintiff/counterdefendants Jenna Massoli p/k/a Jenna Jameson, Jay Grdina, and Dolce Amore,  
6 Inc. was notified, by an e-mail from the undersigned, of this Court’s June 20 pretrial order. A  
7 copy of the pretrial order was attached to that e-mail.

8 On November 28, 2005, Counterdefendant Jay Grdina, husband of plaintiff Jenna  
9 Massoli and one of two sole shareholders of Dolce Amore, Inc. (along with Massoli), was  
10 notified, by e-mail from the undersigned, of the pretrial order. A copy of the pretrial order  
11 was attached to Mr. Grdina’s e-mail.

12 On February 15, 2006, the undersigned e-mailed Mr. Grdina and attorney Crandell a  
13 copy of a letter the undersigned had received from opposing counsel. Opposing counsel  
14 advised that another motion to compel, as well as a motion for sanctions would be  
15 forthcoming unless the responses to their Request for Production of Documents was  
16 supplemented to be responsive. Again, the undersigned requested contact from Mr. Grdina.

17 On February 20, 2006, the undersigned e-mailed attorney Gary Crandell, Esq., of  
18 Denver, Colorado, Massoli and Grdina’s longtime transactional counsel, with copies of  
19 Defendants/Counterclaimants’ most recent filings in this matter, i.e., the Second Motion to  
20 Compel and Request for Sanctions, etc. On February 21, 2006, copies were sent to  
21 Mr. Grdina as well.

22 On March 1, 2006, attorney Jim Blair of this office sent a letter to Mr. Grdina,  
23 Ms. Jameson, and attorney Crandell, via e-mail and U.S. mail, setting forth certain  
24 requirements that would need to be complied with on or before March 3, 2006, and advising  
25 that if those requirements were not met, that the firm would be forced to withdraw from  
26 representation.

1 Neither Mr. Grdina, Ms. Jameson, nor Mr. Crandell responded to that letter, either by  
2 reply e-mail, or by telephone.

3 On March 7, 2006, Mr. Grdina and attorney Crandell were reminded, via e-mail, of the  
4 pending response deadline regarding Defendants/Counterclaimants' Second Motion to  
5 Compel and Motion for Sanctions, etc. On that same date, Mr. Grdina was also furnished with  
6 additional copies of those papers.

7 On March 7, 2006, the undersigned advised opposing counsel that RCDM would be  
8 withdrawing from its representation of Plaintiff/Counterdefendants and sought an extension of  
9 time for RCDM's clients to file a response to the Second Motion to Compel and Motion for  
10 Sanctions. Opposing counsel refused to grant an extension, and Mr. Grdina and attorney  
11 Crandell were advised of that fact.

12 Mr. Grdina has been fully apprised of all pending dates and deadlines in this matter.

13 RESPECTFULLY SUBMITTED this 7<sup>th</sup> day of March, 2006.

14 RENAUD COOK DRURY MESAROS, PA

15  
16 By: /s/ Roger W. Hall  
17 James L. Blair  
18 Roger W. Hall  
19 Phelps Dodge Tower  
20 One North Central, Suite 900  
21 Phoenix, AZ 85004-4417  
22 *Attorneys for Plaintiff/Counterdefendants*

21 Filed electronically this  
22 7<sup>th</sup> day of March, 2006.

23 COPY of the foregoing hand-delivered  
24 to the Honorable Earl H. Carroll the 8<sup>th</sup> day  
25 of March, 2006.

26 ///

///

1 COPY of the foregoing mailed this 7<sup>th</sup> day  
of March, 2006, to:

2  
3 Jeffrey F. Reina, Esq.  
4 LIPSITZ, GREEN, FAHRINGER, ROLL,  
5 SALISBURY & CAMBRIA LLP  
6 42 Delaware Avenue, Suite 300  
7 Buffalo, NY 14202-3857  
8 *Co-counsel for Plaintiff/Counterdefendants*

9 David J. Bodney, Esq.  
10 Dennis K. Blackhurst, Esq.  
11 STEPTOE & JOHNSON, LLP  
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13 201 East Washington Street, Ste 1600  
14 Phoenix, AZ 85004-2382  
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17 16444 North 91<sup>st</sup> Street, Suite 100  
18 Scottsdale, Arizona 85260

19 Mr. Jay Grdina  
20 16444 North 91<sup>st</sup> Street, Suite 100  
21 Scottsdale, Arizona 85260

22 Dolce Amore, Inc.  
23 c/o Mr. Jay Grdina  
24 16444 North 91<sup>st</sup> Street, Suite 100  
25 Scottsdale, Arizona 85260

26 Dolce Amore, Inc.  
15720 N. 83<sup>rd</sup> Place  
Scottsdale, Arizona 85260

19 /s/ Deborah Robertson

20 @PFDesktop\::ODMA/MHODMA/IMANAGE;RCD\_PHX;319559;1