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December 11, 2006

**BY FAX (908) 719-3358
AND UNITED STATES MAIL**Jonathan Rosen, Esq.
1645 Lamington Road
Bedminster, New Jersey 07921RE: **Robert Steinbuch v. Jessica Cutler**
U.S.D.C., District of Columbia
Civil Action File No. 1:05-CV-970 (PLF)

Dear Jonathan,

I have emailed you several times and written a letter requesting a date for your client's deposition and asking whether you have served Ms. Cox. You have not responded to my emails or letter.

Now that the Court has granted the vast majority of our Motion to Compel, I have the added question of when you anticipate supplementing your discovery responses. It seems to me that twenty days should be more than adequate and, therefore, I would ask that you have your verified supplemental responses and documents delivered, in hand, no later than December 29, 2006. Failing adequate supplemental response by that date, I will ask the Court to strike your client's claims.

In addition, given the silence on your end regarding efforts to serve Ms. Cox, it is becoming apparent that no such efforts are underway, notwithstanding what you told the Court. I have attempted to work with you and consider the interests of the still absent Ms. Cox and will, of course, continue to do so. However, given your lack of response to my repeated inquiries, I find myself having no option but to go forward with noticing your client's deposition. While I have noticed it to occur at Beta Court Reporting, please let me know if you will consent to having the deposition take place at local counsel's office, at 2200 Clarendon Blvd., Suite 1201, Arlington, Va. 22201.

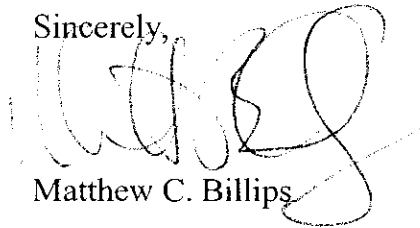
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Therefore, please find enclosed a notice of deposition for Mr. Steinbuch for January 22, 2006. If there is a different date within the discovery period which you would prefer, please let me know and I will attempt to accommodate you.

I look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew C. Billips", written over a faint, dotted grid background.

Matthew C. Billips

MCB/slf

cc: John R. Ates, Esq.

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FAX COVER SHEET

TO: Jonathan Rosen, Esq.

FAX NUMBER: 908/719-3358

FROM: Matthew C. Billips, Esq.

DATE: December 11, 2006

No. of pages, including cover:

RE: Robert Steinbunch v. Jessica Cutler Letter of December 11, 2006
U.S.D.C., District of Columbia
Civil Action File No. 1:05-CV-970 (PLF)

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