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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

MAR - 7 2008
3 - 7 - 2008
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

ILLINOIS COMPUTER RESEARCH, LLC.,
Plaintiff and Counterclaim Defendant,

v.

FISH & RICHARDSON P.C.,
*Defendant, Counterclaimant and
Third-Party Plaintiff,*

v.

SCOTT C. HARRIS,
Third-Party Defendant and Counterclaimant,

v.

FISH & RICHARDSON P.C.,
*Defendant, Counterclaimant, Third-Party
Plaintiff and Counterclaim Defendant.*

Case No. 07 C 5081

Judge Rebecca R. Pallmeyer

Mag. Judge Maria Valdez

**SCOTT HARRIS'S AND ICR'S RESPONSE IN OPPOSITION
TO FISH & RICHARDSON'S RENEWED MOTION TO COMPEL**

Following is Scott Harris's and ICR's Response concerning outstanding issues relating to Fish's Motion to Compel.

1. The Retention Agreements

Scott Harris and ICR have produced the redacted retention agreements.

2. The Privilege Log

In their response to Fish's motion to compel (Dkt. 69, p. 7). Scott Harris and ICR pledged to log every document "created or received by Scott Harris" relating to the clients to be identified by Fish. They have fulfilled that pledge. Fish counters that the log is incomplete because it does not include an e-mail which Fish improperly accessed.

However, Scott Harris has filed a motion for protective order seeking the *return* of that very document and other privileged communications which Fish improperly accessed.

As for Fish's complaint of lack of detail, Fish filed its motion just hours after receipt of the log, without any attempt to confer about (much less identify) any purported deficiencies. Nonetheless, ICR and Mr. Harris sent Fish a revised log on March 7, 2008 which addresses the information requested by Fish.

Respectfully submitted,

/s/ Paul K. Vickrey

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **SCOTT HARRIS'S AND ICR'S RESPONSE IN OPPOSITION TO FISH & RICHARDSON'S RENEWED MOTION TO COMPEL** was filed with the Clerk of Court and electronically mailed to the following:

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on March 7, 2008.

/s/ Paul K. Vickrey