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December 13, 2011

VIA EMAIL ONLY

Daniel Lynch
Lynch & Stern, LLP
E-mail: dan@lynchandstern.com

Re: Meanith Huon v. David Lat, etl al.

Dear Mr. Lynch:

Confirming our conversation from today, I advised you that I had never agreed to give the Jezebel Defendants an extension of time. You advised me that the Jezebel Defendants' attorneys in New York provided you with that basis.

You asked me if I would agree to give the Jezebel Defendants an extension of time. I replied that I would not for the following reasons: As I tried to explain to you, I spoke with the Courtroom Deputy the day after the Court entered the December 5, 2011 order and asked about the meaning of the following language:

As to all Memoranda relating to Above The Law Defendants Motion to Dismiss heretofore filed or scheduled to be filed, all parties shall file on or before December 12, 2011, a summary of no more than 15 pages of their respective Memoranda and a summary of no more than 15 pages of any exhibits to said Memoranda.

I was advised that the Court wanted the plaintiff and the Jezebel Defendants to limit their Memorandum to 15 pages. You advised me that your focus is "narrow" to correcting the motion for extension. However, your focus should encompass inquiring into the intent of the Court's order.

I object to your reference in the Motion for Extension of Time that my Response brief was an "eleventh hour" filing. An "eleventh hour" would be if I had filed a 27 page Response Brief without leave of Court. The parties were given leave to file their respective Memorandum limited to 15 pages and the Jezebel Defendants chose not to do so. I had asked the Court or the Magistrate Judge for the same number of pages allotted for my Response Brief as the 27 page Memorandum and 55 page exhibit filed by your clients.

I also object to your Motion for Extension of Time on the grounds that the relief is patently unfair. It would be patently unfair for the Jezebel Defendants to be given leave to file an 82 page Motion to Dismiss, Memorandum, Exhibits, to be given leave to file a 15 page Summary, to be given leave to file a Reply brief, and to be given more time—after the Defendants’ objection to each and every request to extension from me resulted in the Court limiting the pages of my Response Brief from 27 pages to 15 pages. Furthermore, I had originally filed a motion to modify the briefing schedule, to which the Jezebel Defendants objected. As a result, the Court entered the December 5, 2011 order limiting the memorandum of the parties to 15 pages. Having limited my brief to 15 pages, your clients—who have already filed an 82 page document—should not be given more time to file additional pages.

Very truly yours,

/s/ Meanith Huon

Meanith Huon

cc: All Counsel of Record