

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

SHANA SANDLER,	)	
	)	
Plaintiff	)	
	)	
v.	)	
	)	
MIA CALCAGNI, RALPH CALCAGNI,	)	Case No. 1:07-CV-00029
MAUREEN CALCAGNI, PETER MARS,	)	
and BOOKSURGE, LLC	)	
	)	
Defendants	)	

**RESPONSE OF DEFENDANTS RALPH AND MAUREEN CALCAGNI  
TO BOOKSURGE, LLC'S MOTION FOR SUMMARY JUDGMENT ON CROSS-CLAIM**

In opposing BookSurge LLC's Motion for Summary Judgment on Defendant's cross-claim, the Calcagni defendants adopt the arguments presented in Section III (A) of Plaintiff's Motion for Summary Judgment.

Dated at Bangor, Maine this 14<sup>th</sup> day of April, 2008

/s/ Bruce C. Mallonee, Esq.  
Bruce C. Mallonee, Esq.  
RUDMAN & WINCHELL  
Attorney for Defendants Mia Calcagni,  
Ralph Calcagni, and Maureen Calcagni  
84 Harlow Street, P.O. Box 1401  
Bangor, Maine 04402-1401  
Telephone: (207) 947-4501  
[bmallonee@rudman-winchell.com](mailto:bmallonee@rudman-winchell.com)

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of Response of Defendant's Ralph and Maureen Calcagni to BookSurge, LLC's Motion for Summary Judgment on Cross-Claim upon counsel of record by electronic mail, on the 14<sup>th</sup> day of April, 2008, addressed to:

Bernard J. Kubetz, Esq.  
Eaton Peabody  
Fleet Center – 80 Exchange Street  
P.O. Box 1210  
Bangor, ME 04402-1210  
Tel: 947-0111  
Email: [bkubetz@eatonpeabody.com](mailto:bkubetz@eatonpeabody.com)

J. William Druary, Esq.  
Marden, Dubord, Bernier & Stevens  
44 Elm Street, P.O. Box 708  
Waterville, ME 04903  
Tel.: (207) 873-0186  
FAX: (207) 873-2245  
Email: [bdruary@mardendubord.com](mailto:bdruary@mardendubord.com)

Matthew J. Segal, Esq.  
Kirkpatrick & Lockhart  
Preston Gates Ellis, LLP  
925 Fourth Ave., Suite 2900  
Seattle, WA 98104-1158  
Tel.: 206-370-7595  
Email: [matthew.segal@klgates.com](mailto:matthew.segal@klgates.com)

Steven P. Wright, Esq.  
Kirkpatrick & Lockhart  
Preston Gates Ellis, LLP  
State Street Financial Center  
One Lincoln Street  
Boston, MA 02111-2950  
Tel.: 617-261-3164  
Email: [steven.wright@klgates.com](mailto:steven.wright@klgates.com)

Harold J. Friedman, Esq.  
Friedman, Gathwaite, Wolf & Leavitt, LLP  
Six City Center  
Portland, ME 04112  
Tel: (207) 761-0900  
Email: [hfriedman@fgwl-law.com](mailto:hfriedman@fgwl-law.com)

*/s/ Bruce C. Mallonee*  
Bruce C. Mallonee, Esq.