

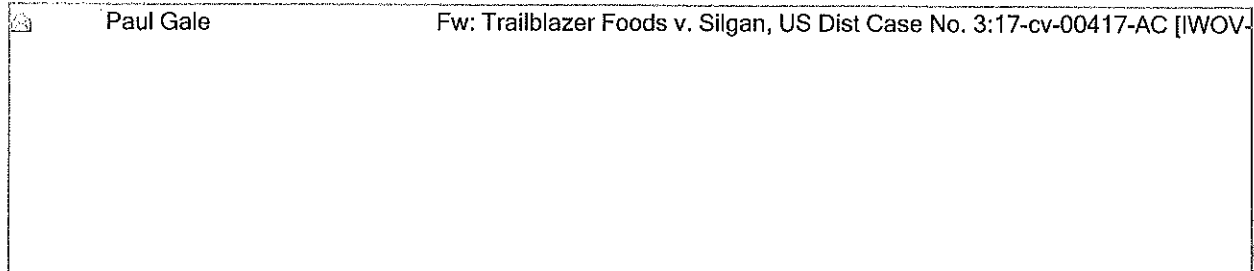


**Fw: Trailblazer Foods v. Silgan, US Dist Case No. 3:17-cv-00417-AC
[IWOV-pdx.FID3901814]**

Paul Gale to: John Acosta

10/19/2017 03:38 PM

From: Paul Gale/ORD/09/USCOURTS
To: John Acosta/ORD/09/USCOURTS@USCOURTS,



FYI

Paul Gale,
Courtroom Deputy,
US District Court,
503-326-8056

----- Forwarded by Paul Gale/ORD/09/USCOURTS on 10/19/2017 03:37 PM -----

From: "Anderson, Dave" <DAnderson@SCHWABE.com>
To: "Paul_Gale@ord.uscourts.gov" <Paul_Gale@ord.uscourts.gov>
Cc: "Parker, Christopher" <cparker@davisrothwell.com>, "Gibson, Debbie" <DGibson@SCHWABE.com>, "Parker, Joel" <JParker@SCHWABE.com>, "Xochihua, Paul R." <PXOCHIHUA@davisrothwell.com>, "Crawford, Selma I." <SCrawford@SCHWABE.com>
Date: 10/19/2017 03:35 PM
Subject: RE: Trailblazer Foods v. Silgan, US Dist Case No. 3:17-cv-00417-AC [IWOV-pdx.FID3901814]

Mr. Gale:

Thank you for confirming the phone call with Judge Acosta next week. At the call, we will request that the discovery and ADR reporting deadline be extended a month. And based on your email, we anticipate that won't be an issue for the Judge and that Tuesday's call will be more focused on the parties' current discovery issue. If I've misunderstood you or got that wrong please let me know.

Assuming my assumption above is correct, I wanted to frame the general issue for Judge Acosta so that he would have an idea as to what Trailblazer is seeking. In short, there are a number of documents that defendant Silgan has produced in redacted form. Trailblazer has requested that these documents, and additional documents responsive to Trailblazer's request for production, be produced without redaction. Counsel for Silgan has indicated that Silgan is concerned that producing these materials may violate various nondisclosure agreements that it has signed with its customers. On this basis, Silgan has withheld production and is seeking to obtain permission from its customers before releasing the documents. Trailblazer is requesting an order requiring production of those documents.

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From: Paul_Gale@ord.uscourts.gov [mailto:Paul_Gale@ord.uscourts.gov]
Sent: Tuesday, October 17, 2017 3:05 PM
To: Anderson, Dave <DAnderson@SCHWABE.com>
Cc: Parker, Christopher <cparker@davisrothwell.com>; Gibson, Debbie <DGibson@SCHWABE.com>; Parker, Joel <JParker@SCHWABE.com>; 'Xochihua, Paul R.' <PXOCHIHUA@davisrothwell.com>; Crawford, Selma I. <SCrawford@SCHWABE.com>
Subject: Re: Trailblazer Foods v. Silgan, US Dist Case No. 3:17-cv-00417-AC [IWOV-pdx.FID3901814]

Also, just request the discovery extension at that time and it will be granted unless you want to file an unopposed motion now.

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Date: 10/17/2017 02:18 PM
Subject: Trailblazer Foods v. Silgan, US Dist Case No. 3:17-cv-00417-AC [IWOV-pdx.FID3901814]

Mr. Gale,
On behalf of the plaintiff in this matter, we would like to schedule a phone call with Judge Acosta regarding two

issues. First, the parties would like to extend the discovery cut off for a month. The discovery deadline is currently set for October 20. Second, plaintiff is requesting court assistance to resolve a document production issue. I anticipate that the call would take no more than 15 minutes. Is the Judge available for a call?

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