

**John Jacks**

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**From:** John Jacks  
**Sent:** Wednesday, March 02, 2011 8:56 AM  
**To:** 'Ian Imrich'; John Henry  
**Cc:** Doug Becker  
**Subject:** RE: Discovery Issues

Ian,

I'm sorry we got cut off at the end of our conversation yesterday. We had some problem with our computers and phones. I didn't get your voicemail until this morning, and I couldn't receive or send any emails until this morning. I think we worked through everything. We still have a number of disagreements, but at least we narrowed those disagreements. Please feel free to call if you there is anything more you would like to discuss.

Please also send us a note on those areas you agreed to amend your responses. Thank you.

Sincerely,

John

**John Jacks**

**GRAY & BECKER, P.C.**  
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**From:** Ian Imrich [mailto:ian@ijilaw.com]  
**Sent:** Tuesday, March 01, 2011 5:04 PM  
**To:** John Jacks; John Henry  
**Cc:** Doug Becker  
**Subject:** RE: Discovery Issues



Hi John, that is not entirely correct. There are some items that fit the discovery requests and/or overlap with other discovery / disclosures that will be provided. Your understanding is not correct. However, as outlined in detail during the call, the lion's share of the items demanded are not subject to discovery. Are you in the office now...?

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**From:** John Jacks [mailto:John.Jacks@graybecker.com]  
**Sent:** Tuesday, March 01, 2011 12:48 PM  
**To:** John Henry; Ian Imrich  
**Cc:** Doug Becker  
**Subject:** Discovery Issues

John and Ian,

I understood from our telephone conference yesterday that Tiltware intends to stand on its objections to Plaintiff's discovery requests. As I said in my previous letter, I am more than happy to try to work through these issues, but I do not feel that we made any progress at all yesterday. If you would like to attempt some resolution, please let me know by 5:00 (CDT). If I don't hear from you, I will assume I am correct in my understanding of your position. As I have previously indicated, I would not be quick to file a motion to compel except that we are on a very tight schedule, so we must have these issues resolved quickly.

John, I also want to point out that I still do not have the complete answers to Plaintiff's interrogatories to Michael Mizrachi. In particular, parts (b) and (c) of Interrogatory No. 3 have not been answered and Interrogatory No. 4 has not been answered. Parts (b) and (c) of Interrogatory No. 3 ask Mizrachi to identify what he wore at each events he listed. He should be able to state what that was. The part of Interrogatory No. 4 that has not been answered is how much Mizrachi was paid by Tiltware. I've read the agreement you provided, but I still cannot tell from the agreement whether he was at a "featured table," etc., so I don't know how much he was paid. I also don't know whether Mizrachi received some other consideration for promoting Full Tilt Poker during the WSOP. Finally, we have not received the \$1,500.00 awarded by the Court. Can you tell me when we can expect payment on that?

Please let me know your answers on these issues.

Sincerely,

John

**John Jacks**

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