

John Jacks

From: John Jacks
Sent: Tuesday, March 01, 2011 2:48 PM
To: 'John Henry'; Ian Imrich (ian@ijilaw.com)
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

GRAY & BECKER, P.C.
ATTORNEYS AT LAW

900 West Ave
Austin, TX 78701
P 512.482.0061
F 512.482.0924
john.jacks@graybecker.com
www.graybecker.com

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John Jacks

From: John Jacks
Sent: Tuesday, March 01, 2011 2:50 PM
To: 'John Henry'; Ian Imrich (ian@ijilaw.com)
Cc: Doug Becker
Subject: Discovery Issues

John and Ian,

There was one other matter: Tiltware agreed to produce some documents that are supposed to be at John's office. When can we get those? Please let me know. Thanks.

John

John Jacks

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ATTORNEYS AT LAW

900 West Ave
Austin, TX 78701
P 512.482.0061
F 512.482.0924
john.jacks@graybecker.com
www.graybecker.com

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