

EXHIBIT B

Bob Siegel

From: Bob Siegel
Sent: Monday, September 11, 2006 6:37 PM
To: 'Floyd Ivey'
Cc: 'doug@mckinleylaw.com'; Bob Siegel
Subject: RE: Omni Innovations LLC v. Ascentive, Schran

Floyd,

Thank you for your request. However, it is respectfully declined. First, we will soon amend the complaint to include a resident of Seattle, who is elderly and would be much inconvenienced by having to prosecute her claims in Richland. Further, since we assume that you will not undertake to represent your client in this action, due to what would be a glaring conflict of interest, we do not expect that the location of counsel will create any prejudice to your client. Of course, should you even attempt to appear to represent interests adverse to your former client Omni, without obtaining the required waiver, such conflict would certainly result in a motion to disqualify, which, of course would likely be granted.

As for the experience of the Courts, I am sure that the Western District would consider itself sufficiently experienced in this area, as do I.

Sincerely,
Bob Siegel

From: Floyd Ivey [mailto:fivey@LICBS.com]
Sent: Monday, September 11, 2006 6:01 PM
To: Bob Siegel; doug@mckinleylaw.com
Subject: Omni Innovations LLC v. Ascentive, Schran

Gentlemen,

You've filed the indicated action in the Western District. Mr. Gordon resides in the Eastern District. The court here is familiar with these cases. I ask that you voluntarily transfer to the Eastern District.

Thank you.

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