

# EXHIBIT P

**Eagan, Patrick**

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**From:** Eagan, Patrick  
**Sent:** Thursday, March 24, 2011 8:50 PM  
**To:** Jay Carlson; Christopher Carney; Jason Moore  
**Cc:** Keehnel, Stelman; Riojas, Omar  
**Subject:** Kim v. Coach et al.

Gentlemen,

In light of the amended answer and counterclaim, are we correct in our assumption that you will be withdrawing your special motion to strike? Please let us know.

In addition, we are ready to hold a Rule 26(f) conference on behalf of Coach, Inc. If that is agreeable to you, let's get something on the calendar for next week, preferably Tuesday, Wednesday, or Thursday. Let us know and we will propose some times.

Thanks,  
Patrick



**Patrick Eagan**  
DLA Piper LLP (US)  
701 Fifth Avenue, Suite 7000  
Seattle, Washington 98104  
T 206.839.4840  
F 206.494.1830  
[Patrick.Eagan@dlapiper.com](mailto:Patrick.Eagan@dlapiper.com)  
[www.dlapiper.com](http://www.dlapiper.com)

Admitted to practice in Washington, Virginia, and the District of Columbia.

# **EXHIBIT Q**

**Eagan, Patrick**

---

**From:** Jay Carlson [jaycarlson.legal@gmail.com]  
**Sent:** Thursday, March 24, 2011 9:01 PM  
**To:** Eagan, Patrick  
**Cc:** Christopher Carney; Jason Moore; Keehnel, Stellman; Riojas, Omar  
**Subject:** Re: Kim v. Coach et al.

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Jay Carlson  
Carlson Legal  
100 West Harrison Street  
Suite N440  
Seattle, WA 98119  
P: (206) 445-0214  
F: (206) 260-2486

# **EXHIBIT R**

**Eagan, Patrick**

**From:** Eagan, Patrick  
**Sent:** Friday, March 25, 2011 4:50 PM  
**To:** Jay Carlson; Christopher Carney; Jason Moore  
**Cc:** Keehnel, Stelman; Riojas, Omar  
**Subject:** RE: Kim v. Coach et al.

Gentlemen,

We have not heard back from you on the Rule 26(f) conference. As I indicated in my earlier email, we are available for a Rule 26(f) conference next week. Please let us know.

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# **EXHIBIT S**

## Eagan, Patrick

---

**From:** Eagan, Patrick  
**Sent:** Monday, March 28, 2011 9:12 AM  
**To:** Eagan, Patrick; 'Jay Carlson'; 'Christopher Carney'; 'Jason Moore'  
**Cc:** Keehnel, Stelman; Riojas, Omar  
**Subject:** RE: Kim v. Coach et al.

Gentlemen,

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Thanks,  
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# **EXHIBIT T**

**Eagan, Patrick**

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**From:** Christopher Carney [christopher.carney@cgi-law.com]  
**Sent:** Monday, March 28, 2011 9:21 AM  
**To:** Eagan, Patrick  
**Cc:** Jay Carlson; Jason Moore; Keehnel, Stelman; Riojas, Omar  
**Subject:** Re: Kim v. Coach et al.

We are of course willing to schedule the 26(f) conference. I will suggest dates by noon.

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Carney Gillespie Isitt PLLP  
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# **EXHIBIT U**

**Eagan, Patrick**

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**From:** Eagan, Patrick  
**Sent:** Monday, March 28, 2011 9:27 AM  
**To:** Christopher Carney  
**Cc:** Jay Carlson; Jason Moore; Keehnel, Stellman; Riojas, Omar  
**Subject:** RE: Kim v. Coach et al.

Please also confirm that you will take your motion off the calendar.

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**From:** Christopher Carney [mailto:christopher.carney@cgi-law.com]  
**Sent:** Monday, March 28, 2011 9:21 AM  
**To:** Eagan, Patrick  
**Cc:** Jay Carlson; Jason Moore; Keehnel, Stellman; Riojas, Omar  
**Subject:** Re: Kim v. Coach et al.

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# EXHIBIT V

**Eagan, Patrick**

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**From:** Jay Carlson [jaycarlson.legal@gmail.com]  
**Sent:** Monday, March 28, 2011 9:42 AM  
**To:** Eagan, Patrick  
**Cc:** Christopher Carney; Jason Moore; Keehnel, Stelman; Riojas, Omar  
**Subject:** Re: Kim v. Coach et al.

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# **EXHIBIT W**

**Eagan, Patrick**

**From:** Christopher Carney [christopher.carney@cgi-law.com]  
**Sent:** Monday, March 28, 2011 10:26 AM  
**To:** Jay Carlson  
**Cc:** Eagan, Patrick; Jason Moore; Keehnel, Stellman; Riojas, Omar  
**Subject:** Re: Kim v. Coach et al.

Gentlemen:

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We will consider that and get back to you when able.

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Please also confirm that you will take your motion off the calendar.

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**Sent:** Monday, March 28, 2011 9:21 AM  
**To:** Eagan, Patrick  
**Cc:** Jay Carlson; Jason Moore; Keehnel, Stellman; Riojas, Omar  
**Subject:** Re: Kim v. Coach et al.

We are of course willing to schedule the 26(f) conference. I will suggest dates by noon.

Christopher Carney  
Attorney at Law  
Carney Gillespie Isitt PLLP  
100 W. Harrison St., Suite N440  
Seattle, Washington 98119  
Tel (206) 445-0212  
Fax (206) 260-2486  
WSBA # 30325

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Gentlemen,

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Thanks,

Patrick

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**From:** Eagan, Patrick  
**Sent:** Friday, March 25, 2011 4:50 PM  
**To:** Jay Carlson; Christopher Carney; Jason Moore  
**Cc:** Keehnel, Stelman; Riojas, Omar  
**Subject:** RE: Kim v. Coach et al.

Gentlemen,

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Patrick

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**To:** Eagan, Patrick  
**Cc:** Christopher Carney; Jason Moore; Keehnel, Stelman; Riojas, Omar  
**Subject:** Re: Kim v. Coach et al.

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In addition, we are ready to hold a Rule 26(f) conference on behalf of Coach, Inc. If that is agreeable to you, let's get something on the calendar for next week, preferably Tuesday, Wednesday, or Thursday. Let us know and we will propose some times.

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Patrick



**Patrick Eagan**

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# **EXHIBIT X**

**Eagan, Patrick**

**From:** Eagan, Patrick  
**Sent:** Monday, March 28, 2011 10:31 AM  
**To:** Christopher Carney; Jay Carlson  
**Cc:** Jason Moore; Keehnel, Stelman; Riojas, Omar  
**Subject:** RE: Kim v. Coach et al.

Gentlemen,

How about 10am on Thursday? We will host.

If you would please continue your motion another week, you will prevent us from having to file an opposition to your motion.

Thanks,  
Patrick

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**From:** Christopher Carney [mailto:[christopher.carney@cgi-law.com](mailto:christopher.carney@cgi-law.com)]  
**Sent:** Monday, March 28, 2011 10:26 AM  
**To:** Jay Carlson  
**Cc:** Eagan, Patrick; Jason Moore; Keehnel, Stelman; Riojas, Omar  
**Subject:** Re: Kim v. Coach et al.

Gentlemen:

We are available to conduct the CR 26(f) conference any time before 3pm on Thursday March 31.

Regarding our motion: given the background of the case up to this point, our position is that we will strike our motion only after a complete CR 26(f) conference has been conducted.

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**Sent:** Monday, March 28, 2011 9:21 AM  
**To:** Eagan, Patrick  
**Cc:** Jay Carlson; Jason Moore; Keehnel, Stelman; Riojas, Omar  
**Subject:** Re: Kim v. Coach et al.

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Christopher Carney



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We still have not heard back from you on the Rule 26(f) conference. Considering your outstanding motion to compel, we would appreciate a response.

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Patrick

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**From:** Eagan, Patrick  
**Sent:** Friday, March 25, 2011 4:50 PM  
**To:** Jay Carlson; Christopher Carney; Jason Moore  
**Cc:** Keehnel, Stelman; Riojas, Omar  
**Subject:** RE: Kim v. Coach et al.

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**Cc:** Christopher Carney; Jason Moore; Keehnel, Stelman; Riojas, Omar  
**Subject:** Re: Kim v. Coach et al.

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# **EXHIBIT Y**

**Eagan, Patrick**

---

**From:** Christopher Carney [christopher.carney@cgi-law.com]  
**Sent:** Monday, March 28, 2011 11:05 AM  
**To:** Eagan, Patrick  
**Cc:** Jay Carlson; Jason Moore; Keehnel, Stellman; Riojas, Omar  
**Subject:** Re: Kim v. Coach et al.

Gentlemen:

We will see you at your office on Thursday at 10:00 a.m. for the CR 26(f) conference.

As you know, we have been asking you to schedule a CR 26(f) conference since February 14, and it has taken six weeks and a motion to compel to get to this point. Considering the difficulties and wasted time caused by your refusal to participate in a CR 26(f) conference, we are looking at the possibility of requesting sanctions under CR 37(f). Because the conference has yet to be completed, and because of the sanctions issue, we are unwilling to continue our motion.

We will certainly consider striking the motion on Thursday if the conference is completed satisfactorily, but we may still pursue the sanctions issue. The only way we could consider continuing the motion would be if you are willing to voluntarily pay our fees for preparing the motion to compel, in the amount of \$750.00. Let us know if you are willing to agree to that, otherwise we cannot agree to a continuance. Thank you.

On Mon, Mar 28, 2011 at 10:30 AM, Eagan, Patrick <[Patrick.Eagan@dlapiper.com](mailto:Patrick.Eagan@dlapiper.com)> wrote:  
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