

Scott Jerger

From: Scott Jerger
Sent: Thursday, June 29, 2006 12:15 PM
To: 'victoria@vkhall-law.com'
Subject: RE: Motion to Set a Briefing Schedule

Victoria:

Since I filed my motion on June 1, I would like to set a briefing schedule that allows the judge ample time to review the papers. I am also sensitive to your time constraints. I will agree to the July 12 deadline, but I would like until July 25th to respond given my busy schedule the week of July 17th. Please let me know if this works for you by close of business today. If so, I will send you the stipulation via email today and file once you return the stipulation to me on Saturday. If you do not agree to this schedule, I will file a motion with the Court tomorrow to set a briefing schedule, noting that you oppose the motion.

Scott

Scott Jerger
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From: victoria@vkhall-law.com [mailto:victoria@vkhall-law.com]
Sent: Thursday, June 29, 2006 12:07 PM
To: Scott Jerger
Subject: RE: Motion to Set a Briefing Schedule

I probably can't meet a deadline of next Friday, given other business I have pending and the way this week has turned out. So let's leave the deadline as it was.

----- Original Message -----

Subject: RE: Motion to Set a Briefing Schedule
 From: "Scott Jerger" <scott@fieldlawfirm.com>
 Date: Wed, June 28, 2006 3:37 pm
 To: <victoria@vkhall-law.com>

Victoria:

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I would really like to keep the deadlines as first suggested as I've got a lot going on the week of July 17th. Is this still OK with you? If so, let me know if you authorize me to conform your signature and I'll file the stipulated motion before Friday.

Thanks,
Scott

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From: victoria@vkhall-law.com [mailto:victoria@vkhall-law.com]
Sent: Wednesday, June 28, 2006 1:35 PM
To: Scott Jerger
Subject: RE: Motion to Set a Briefing Schedule

I have a deadline of June 30 in another matter, have already put in one all-nighter this week, and may put in more. Let's move the deadlines to July 12 and 19th, and I will sign and fax the stip to you no later than Saturday, July 1.

----- Original Message -----

Subject: RE: Motion to Set a Briefing Schedule
From: "Scott Jerger" <scott@fieldlawfirm.com>
Date: Wed, June 28, 2006 9:35 am
To: <victoria@vkhall-law.com>

Thanks Victoria,

I can either wait until tomorrow evening when you fax a copy or I can file today if you sign the document and authorize me to conform your signature with the "/s/" for electronic filing and then subsequently fax me the signed version for my file. Just let me know which you would prefer.

Thanks,
Scott

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From: victoria@vkhall-law.com [mailto:victoria@vkhall-law.com]
Sent: Wednesday, June 28, 2006 5:23 AM
To: Scott Jerger

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Thursday, June 29, 2006 (4).max

Subject: RE: Motion to Set a Briefing Schedule

I'm out of the office and just got this email (and the one from Monday afternoon with the attached document). I cannot get to a fax machine until tomorrow evening at the earliest. If you want to file today, include my email giving the OK as an attachment.

----- Original Message -----

Subject: Motion to Set a Briefing Schedule
From: "Scott Jerger" <scott@fieldlawfirm.com>
Date: Tue, June 27, 2006 3:05 pm
To: <victoria@vkhall-law.com>

Dear Victoria:

This is a reminder email regarding the proposed stipulated motion and proposed order that I sent for your review yesterday. Please send me a signed copy of the stipulated motion if it meets with your approval and I will file the document with the Court.

Thank you,
Scott

Scott Jerger
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From: Scott Jerger
Sent: Monday, June 26, 2006 3:55 PM
To: 'victoria@vkhall-law.com'
Subject: RE: Motion to Set a Briefing Schedule

Victoria:

Attached for your consideration are a stipulated motion and proposed order regarding the briefing schedule. If the stipulated motion meets with your approval, please sign and either fax or pdf a copy to me. Thank you.

Scott

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From: victoria@vkhall-law.com [mailto:victoria@vkhall-law.com]
Sent: Monday, June 26, 2006 11:12 AM
To: Scott Jerger
Subject: RE: Motion to Set a Briefing Schedule

I agree to this briefing schedule.

Victoria Hall

----- Original Message -----
Subject: Motion to Set a Briefing Schedule
From: "Scott Jerger" <scott@fieldlawfirm.com>
Date: Fri, June 23, 2006 1:48 pm
To: <victoria@vkhall-law.com>

Dear Victoria:

As you are aware, my clients have a pending motion to dismiss and motion to stay and bifurcate portions of this case (docket #42) with the Court. Since this motion was filed subsequent to the first round of motions, it was not subject to the original order setting the briefing schedule on the first round of motions. I would like to file a motion with the Court to set a briefing schedule for your opposition and my reply to this motion to dismiss and motion to stay and bifurcate portions of this case (docket #42). Please let me know if you agree to the following proposed briefing schedule and I will submit a stipulated motion to the Judge.

June 1: KAM and Katzer's Motion to Dismiss for failure to state a claim and for lack of subject matter jurisdiction and motion to bifurcate and stay filed.
July 7: Deadline for your Memorandum in Opposition to the above-referenced motion
July 14: Deadline for Reply

By tailoring the briefing schedule this way, I am trying to provide adequate time for both the response and the reply, while still allowing the Judge ample time to review the written submissions prior to our oral argument date of August 11th. I would appreciate a response to this email by Monday, June 26th.

Regards,
Scott

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