

**Steve Mastrantonio**

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**From:** Steve Mastrantonio  
**Sent:** Thursday, September 03, 2015 4:10 PM  
**To:** Marc Randazza (mjr@randazza.com)  
**Subject:** Ellora v. Dear Author

Marc,

Did you want to revisit our discussion of the other day concerning discovery? I'll be filing a response opposing your request for clarification on discovery. I do not want to open a wide and expensive discovery berth for new depositions. Having said that, I would agree to address the discovery requests you propounded. Let me know if you want to talk about it tomorrow. I'll be around all day.

Sincerely,

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**Steve Mastrantonio**

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**From:** Steve Mastrantonio  
**Sent:** Monday, September 07, 2015 1:54 PM  
**To:** Marc Randazza (mjr@randazza.com)  
**Subject:** Ellora v Dear Author

Marc,

I wanted to follow up as I haven't forgotten about the document request. I've instructed my client to gather the documents per your requests. I have a phone conference scheduled with the client tomorrow and will be able to tell you what documents we weren't able to produce. There are just a few objections and I will discuss them with you after I speak to the client tomorrow.

Sincerely,

*Steven W. Mastrantonio, Esq.*  
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