

From: Brad Edwards <[REDACTED]>

To: jeffrey E. <jeevacation@gmail.com>

Subject: Re:

Date: Fri, 25 Sep 2015 10:44:56 +0000

(1) I don't control that call completely. Everyone on my side has wanted the depositions since January and they are finally happening. (2) that case either settles or it doesn't. There is nothing complicated about it. There is nothing that needs more time. I'm being more than reasonable in the offer to settle that case. I do not want that case to turn into our case - where it goes on for years. We take these depositions, add punitives, then get a trial. And it ends. Once and for all.

If it is the other case that is driving the delay, I don't understand that. Clearly one case has nothing to do with the other. And really, considering the facts of that case I could not be more reasonable than I am being there also. I feel like on one hand you say you want a global settlement. That is fine with me so we have tried to work toward that end. But the reality is that you want me to agree to some unreasonable deal.

If we think about the cases, and what was alleged, I'm crazy to be considering the numbers we are talking about. Juries will render multi-million dollar verdicts for me and I believe over \$20m. I know you say my reputation has not been harmed. But that's not true. I've done good work to overcome and mitigate the damage but between you and Dersh considerable damage was done.

Fair resolution on that case- option one - payment to me of \$5 m inclusive of fees and costs or option two some ratio idea based on the 4th decision. Anything beyond that point adds too many variables and defeats the point.

CVRA I talked to an ethics expert and the previous offer would be acceptable. Would have to fine-tune it but overall it's fine.

I know you share my feeling about not wasting time, and I appreciate your trying to get the best deal possible. But at this point, we are either going to reach an agreement or agree to disagree.

Sent from my iPhone

On Sep 25, 2015, at 1:19 AM, jeffrey E. <jeevacation@gmail.com> wrote:

dersh people are telling me that a depo delay , needs to happen by today. if we are going to get it settled. . your call, but i see little downside in you agreeing. that being said . i also understand your position. and make no reps on his behalf. .

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please note

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