

From: Tonja Haddad Coleman <[REDACTED]>
To: "Mary E. Pirrotta" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>
CC: 'Brad Edwards' <[REDACTED]>, 'Maria Kelljchian' <[REDACTED]>, "[REDACTED]" <[REDACTED]>
Subject: RE: Regarding: Edwards, Bradley adv. Epstein (File #: 291874)
Date: Fri, 19 Oct 2012 17:03:55 +0000

I just spoke with Mr. Haddad (who is traveling) since you did not copy his assistant on the last email. Please be advised that moving the hearing to 2PM to accommodate your conflict does not work for him. Because you failed to respond to Mr. Haddad when he notified you *the day he received the notice of hearing from the Judge* regarding his request to move the hearing, he already changed his flight to accommodate the hearing set for 1:30. As such, starting the hearing at a later time is not possible. Moreover, according to your own documents filed with the Court with your request to continue the hearing, your conflict also existed at the time Mr. Haddad requested to move the hearing, yet you failed to even respond to him. One should not demand accommodation or cooperation when one fails to give it. Accordingly, Mr. Haddad will see you Monday morning.

Finally, we are requesting, yet again, that you provide dates upon which the continuation of Mr. Edwards' deposition will take place. You conceded at the last hearing that your pending Motion to Disqualify Mr. Haddad cannot, and will not, stay discovery. Should we not hear from you (or whomever you designate to coordinate scheduling) by Monday at 5, we will unilaterally set same.

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[REDACTED] facsimile

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From: Mary E. Pirrotta [mailto:[REDACTED]]
Sent: Friday, October 19, 2012 11:51 AM
To: Tonja Haddad Coleman; [REDACTED]; [REDACTED]; [REDACTED]
Cc: 'Brad Edwards'; 'Maria Kelljchian'
Subject: FW: Regarding: Edwards, Bradley adv. Epstein (File #: 291874)

With regard to the 1:30 hearing on 10/25 on Motion to Disqualify Opposing Counsel, Judge Crow's JA advises that the hearing could be moved to a 2 p.m. start time to accommodate our conflict. Please advise if you would be agreeable to starting the hearing at 2 p.m. on that date which would obviously also cancel Monday's UMC hearing on Motion to Reschedule.

Jack Scarola

JS/mep

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