
Fw: Sadeghi v Pinscreen -- Sadeghi website

From: Clay Wilkinson <clay@fzlaw.com>
Sent: Thursday, September 5, 2024 8:19 AM
To: Griff Towle <GTOWLE@bartkolaw.com>; Adam Zaffos <adam@fzlaw.com>
Cc: Benjamin Davidson Esq. <bdauidson@bendavidsonlaw.com>
Subject: Re: Sadeghi v Pinscreen -- Sadeghi website

Hi Griff,

Plaintiff has removed the links as a gesture of good faith and to resolve this issue without the need for motion practice.

However, we disagree with your conclusory statements and note that the Court did not incorporate the language you reference in its minute order. We believe this omission stems from the fact that the statements made from the bench were not part of the Court's ruling.

Plaintiff's position remains that the documents posted on the website were obtained independently of the USC subpoena and from publicly accessible sources, such as the version available on PDFHost.io website. (see: https://pdfhost.io/v/n9GuGETbV_USC_Report).

Specifically, the Court-Executed Stipulation, dated February 3, 2021, states on Page 2:

"[...] the designation of these USC subpoena produced documents will have no bearing on the confidentiality designation or lack thereof of any duplicative documents Plaintiff already had or obtains outside of the USC subpoena."

Furthermore, the Court-Executed Protective Order, dated March 11, 2020, in Paragraph 2, provides:

"The Designating Party shall have the right to designate as 'Highly Confidential' only the non-public Documents, Testimony, or Information [...]"

It is undisputed that the USC investigation documents have been publicly available for over two years, including the version hosted on PDFHost.io, which has been accessed over 33,000 times to date. (see: <https://pdfhost.io/search?text=USC+Report+Hao+Li+Fraud>).

Sincerely,

Clay

From: Griff Towle <GTOWLE@bartkolaw.com>
Sent: Wednesday, September 4, 2024 10:00 AM
To: Adam Zaffos <adam@fzlaw.com>; Clay Wilkinson <clay@fzlaw.com>
Cc: Benjamin Davidson Esq. <bdauidson@bendavidsonlaw.com>
Subject: FW: Sadeghi v Pinscreen -- Sadeghi website

Adam & Clay,

Can I please hear from you on this.

Thank you.

Griff

From: Griff Towle
Sent: Friday, August 30, 2024 1:48 PM
To: Adam Zaffos <adam@fzlaw.com>; Clay Wilkinson <clay@fzlaw.com>
Subject: Sadeghi v Pinscreen -- Sadeghi website

Adam & Clay –

Dr. Sadeghi's website still includes links to documents that were originally produced by USC and designated Attorney's Eyes Only pursuant to the parties' Stipulation to Continue Trial dated February 3, 2021, and which are subject to the Protective Order. Judge Scheper was very clear at the hearing on plaintiff's motion to enforce the subpoena to ACM that she views this as a breach of the Protective Order. See pages 5/6 of the attached transcript from the hearing.

Please confirm that Dr. Sadeghi will immediately remove the links from his website.

Thank you.

Griff

Bartko

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