From: jeffrey E. <jeevacation@gmail.com>
Sent: Friday, September 25, 2015 11:45 AM
To: Brad Edwards
Subject: Re:

we both agreed i am the underdog in the 4th, as they will =e in conflict with themselves. . so if you now say no sc. =A0 then , I would propose you pay me 100k if i win and I pay you a million=if i lose. - dersh is my time, no financial risk to me. still = would like to get it settled or delayed , , cvra , is =ot the ethical as much as the pr. and judge reaction. i appreciate y=u taking the time to try to work it out. .

On Fri, Sep 25, 2015 at 6=44 AM, Brad Edwards [redacted] > wrote:

(1) I don't control that call completely. Everyone on my sid= has wanted the depos since January and they are finally happening. =2) that case either settles or it doesn't. There is nothing complicate= 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 depos, add punitives, then get a trial. And it ends. Once a=d for all.

If it is the other case that is driving the delay, I don't underst=nd that. Clearly one case has nothing to do with the other. And really, co=sidering the facts of that case I could not be more reasonable than I am b=ing there also. I feel like on one hand you say you want a global settlement. That is fine with me so w= have tried to work toward that end. But the reality is that you want me t= 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-mil=ion dollar verdicts for me and I believe over $20m. I know you say my repu=ation has not been harmed. But that's not true. I've done good work to overcome and mitigate the damage but =etween you and Dersh considerable damage was done.

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

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

I know you share my feeling about not wasting time, and I appreciate y=ur trying to get the best deal possible. But at this point, we are either =oing 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 <mailto:jeevacation@g=ail.com> > wrote:

dersh people are telling me that a depo delay , needs to h=ppen 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 =nderstand your position. and make no reps on his behalf. .

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