

Larry Klayman < leklayman@gmail.com>

## Meet and Confer Conference and Joint Status Report

1 message

Larry Klayman < leklayman@gmail.com>

Thu, Jan 24, 2013 at 4:23 PM

To: Lottie Cohen < lottie.cohen@hotmail.com>

Cc: Renee Daughetee <rdaughetee@hotmail.com>

Dear Ms. Cohen:

In light of the court's minute order of about a half hour ago, I propose that we meet and confer tomorrow afternoon to prepare a joint status report.. Please advise when you will be available to speak and we will make ourselves available. I do not have anything else scheduled for tomorrow afternoon.

Sincerely,

Larry Klayman Pro Se



Larry Klayman Kiskiayman@gmail.com>

## FW: Kempe v Klayman - Meet & Confer Letter

Lottie Cohen < lottie.cohen@hotmail.com>

Wed, Jan 23, 2013 at 3:09 PM

Reply-To: lottie.cohen@hotmail.com

To: Larry Klayman <leklayman@gmail.com>, Renee Daughetee <rdaughetee@hotmail.com>

Can each of you please respond today?

We need to first meet and confer and then notify the Court.

Lottie Cohen

Law Offices of Lottie Cohen

3637 Motor Avenue, Suite 360

Los Angeles, California 90034-4883

Phone: (310) 204-0089

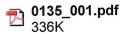
Fax: (310) 204-0095

From: lccopier@sbcglobal.net [mailto:lccopier@sbcglobal.net]

Sent: Wednesday, January 23, 2013 2:55 PM

To: lcattorneyb@sbcglobal.net; Lottie

Subject: Kempe v Klayman - Meet & Confer Letter



Larry Klayman < leklayman@gmail.com>

To: lottie.cohen@hotmail.com

Cc: Renee Daughetee <rdaughetee@hotmail.com>

Wed, Jan 23, 2013 at 3:17 PM

Will be be moving to stay the meet and confer conference and discovery today until such time as our dispositive

motions are heard and decided. Please advise whether you will consent. If I do not hear from you by 5 pm, we assume you do not consent.

Also, in light of Mr. Vincent Cranberry's prior trespass and misrepresentations, please do not have him contact me. Please communicate with me in writing where appropriate.

Larry Klayman
[Quoted text hidden]

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http://www.pctools.com

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Lottie Cohen < lottie.cohen@hotmail.com>

Reply-To: lottie.cohen@hotmail.com

To: leklayman@gmail.com, rdaughtee@hotmail.com

To Mr. Klayman and Ms. Daughtee: From Lottie Cohen, Attorney for Plaintiff 1/23/2913

The meet and confer between us is technically overdue so time is of the essence. Since Mr. Klayman only filed a responsive pleading yesterday and Ms. Daughtee has yet to file a notice of motion or enter into the federal case with any answer or responsive pleading, I am now coming forward on behalf of the plaintiff Martin Kempe to ask you to please participate in a telephonic meet and confer. I shall again be telephoning each of you again tomorrow asking you to go over the Federal Rule details with me so as to comply. Please indicate a precise time I may telephone you and your best phone number. Please assist me in this, as otherwise I shall just file one unilaterally.

[Quoted text hidden]

http://www.pctools.com/ ======



Larry Klayman < leklayman@gmail.com>

To: lottie.cohen@hotmail.com

Cc: Renee Daughetee <rdaughetee@hotmail.com>

Dear Ms. Cohen:

You apparently filed your unilateral status report before attempting to speak with me or Ms. Lewitzke's counsel today, as you stated you would in your last email.

I believe that your filing is premature prior to the court ruling on our motion to postpone. As we argued to the court, your complaint is fatally defective and frivolous on its face and to unnecessarily use the parties' resources and the court's limited resources at this time, prior to the hearing and disposition of our Rule 12(b) (6) and Rule 56 motion to dismiss and for summary judgment, is wasteful and simply runs up attorney and court time and costs for all concerned.

I will also be sending you in short order a Rule 11 demand to dismiss your complaint with prejudice voluntarily given its frivolousness.

Sincerely,

Larry Klayman

Lorny Klayman

Wed, Jan 23, 2013 at 8:54 PM

Thu, Jan 24, 2013 at 3:49 PM