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9 Attorneys for Ankura Consulting Group, LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

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13
14 *In Re* Subpoenas to Michael J. Mandelbrot,
15 Mandelbrot Law Firm, and Asbestos Legal
Center,

Misc. Case No.

**DECLARATION OF REBECCA L.
SCIARRINO IN SUPPORT OF ANKURA
CONSULTING GROUP, LLC'S MOTION
TO COMPEL**

17 William H. Durham,
18 Plaintiff,

*Filed Concurrently: Ankura Consulting
Group, LLC's Notice of Motion and Motion to
Compel; Memorandum of Points and
Authorities; Declaration of John G. Smith;
Proposed Order*

19 vs.

20 Ankura Consulting Group, LLC,
21 Defendant.

Underlying Action:
*Case No. 2:20-CV-112-KS-MTP
U.S. District Court (S.D. Miss.)
Judge: Hon. Keith Starrett*

1 I, Rebecca L. Sciarrino, declare:

2 1. I am an attorney with the law firm of Munger, Tolles & Olson LLP and counsel to
3 Defendant Ankura Consulting Group, LLC (“Ankura”) in this case. I am licensed to practice law
4 in the States of California and New York, and I am admitted to practice in this District. I have
5 personal knowledge of the facts stated herein and, if called as a witness, would competently testify
6 thereto. I submit this declaration in support of Ankura’s Motion to compel Michael J. Mandelbrot,
7 the Mandelbrot Law Firm, and the Asbestos Legal Center to comply with the subpoenas
8 propounded upon them.

9 2. As explained in the Declaration of John G. Smith, filed concurrently herewith, the
10 subpoenas to the Mandelbrot Law Firm and the Asbestos Legal Center (together, the “Entity
11 Subpoenas”) were served on November 3, 2021. The subpoena to Michael J. Mandelbrot was
12 served on November 21, 2021. The Entity Subpoenas set a return date of November 12, 2021 at
13 10:00 a.m. at the law offices of the undersigned. The Entity Subpoenas also permitted compliance
14 by the subpoenaed parties’ producing the responsive documents electronically, by email. The
15 November 12 compliance date passed and no one appeared to produce or produced the requested
16 documents. Nor did I receive any response to the Entity Subpoenas on or before that date.

17 3. Cursory objections to the Entity Subpoenas were emailed to me on November 15,
18 2021. Counsel for the plaintiff in the underlying litigation, Mr. Norman Pauli, was copied on that
19 email.

20 4. Over the three-and-a-half week period between then and yesterday, December 8,
21 2021, I met and conferred with the Mandelbrot Law Firm and the Asbestos Legal Center, through
22 their principal, Mr. Mandelbrot, regarding their objections. The individual subpoena on Mr.
23 Mandelbrot was served during this period, on November 21, 2021. That subpoena is substantively
24 identical to the Entity Subpoenas, and the meet and confer covered it as well. The meet and confer
25 included emails, formal letters and an extended telephone conference. Attached hereto as Exhibit
26 A is a true and correct copy of the meet-and-confer correspondence I exchanged with Mr.
27 Mandelbrot, including the emails and letters that we exchanged. There was also a telephone
28 conference on Wednesday, December 8, 2021. Attached hereto as Exhibit B is a true and correct

1 copy of my email exchange with Mr. Mandelbrot addressing the substance of our telephonic
2 discussions that day.

3 5. In his emails, Mr. Mandelbrot admitted that Dr. Durham has prepared a medical
4 report for him, though Mr. Mandelbrot contends that this occurred only once. *See* Ex. A. Mr.
5 Mandelbrot has also admitted during the meet and confer that all of his responsive documents are
6 emails.

7 6. We did not reach a resolution in the meet and confer. In fact, a good portion of the
8 December 8, 2021 telephone call was devoted to Mr. Mandelbrot's impugning the ethics and
9 professionalism of Ankura, the Trusts, the lawyers defending Ankura in the Underlying Action,
10 and the undersigned and her colleague. Mr. Mandelbrot stated more than once that he would be
11 posting on his blog on the internet about the meet and confer, and the undersigned and her
12 colleague's supposed participation in unethical conduct for the simple act of taking the required
13 steps to enforce the subpoenas. In my personal review of Mr. Mandelbrot's blog, located at
14 <https://www.mesothelioma-lawyerblog.com/>, I saw a number of prior statements that impugn the
15 integrity of lawyers who work for the Trusts or Ankura. I perceived Mr. Mandelbrot's statements
16 as threatening.

17 7. Mr. Mandelbrot said that he wanted to speak again on Friday, December 10, 2021,
18 and he would in the meantime be speaking with Dr. Durham, the plaintiff in the Underlying
19 Action. We told him we would make ourselves available for such a call, but that in light of the
20 tenor of our telephonic discussion with him, and the schedule in the Underlying Action, we did not
21 believe it would be appropriate to delay the filing of this motion to compel pending that
22 discussion. After the telephonic discussion, we by email proposed specific times for the requested
23 additional call, also reiterating that we would not delay the filing of this motion. *See* Ex. B.

24 8. On the evening of December 8, 2021, I visited Mr. Mandelbrot's blog, and saw that
25 Mr. Mandelbrot, a member of the California Bar (bar no. 172626), posted a defamatory and
26 baseless attack on me, my colleague Stuart Senator, and my law firm. I downloaded a true and
27 correct copy of this blog post, which is attached here as Exhibit C. The blog post can also be
28

1 located at <https://www.mesothelioma-lawyerblog.com/munger-tolles-olson-llp-the-enablers-of->
2 asbestos-trust-fraud-stuart-senator-becca-sciarrino/.

3

4 I declare under penalty of perjury under the laws of the United States that the foregoing is
5 true and correct.

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Executed this 9th day of December 2021, in San Francisco, California.

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Rebecca L. Sciarrino

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EXHIBIT A

From: [Sciarrino, Becca](#)
To: [Michael Mandelbrot](#)
Cc: [npauli@paulilaw.com](#); [Smith, John G.](#); [Senator, Stuart](#)
Subject: RE: Case No: 2:20-CV-112-KS-MTP - Response to Subpoena (Objection)
Date: Monday, December 6, 2021 10:10:28 AM

Great. I'll call you on Wednesday at 1:00. I'll plan to dial (415) 895-5175, but please let me know if you prefer a different telephone number.

Best,
Rebecca

Rebecca L. Sciarrino ([she, her, hers](#)) | Munger, Tolles & Olson LLP
560 Mission Street | San Francisco, CA 94105
Tel: 415.512.4097 | rebecca.sciarrino@mto.com | www.mto.com

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From: Michael Mandelbrot <mandelbrot@asbestoslegalcenter.org>
Sent: Monday, December 6, 2021 9:57 AM
To: Sciarrino, Becca <Rebecca.Sciarrino@mto.com>
Cc: [npauli@paulilaw.com](#); [Smith, John G.](#) <jgsmith@balch.com>; [Senator, Stuart](#) <Stuart.Senator@mto.com>
Subject: Re: Case No: 2:20-CV-112-KS-MTP - Response to Subpoena (Objection)

Either is fine.

Thanks,

Mike

Michael J. Mandelbrot
Mandelbrot Law Firm/Asbestos Legal Center
1223 Grant Ave. Suite C
Novato, CA 94945

(415) 895-5175
(415) 727-4700 (fax)
Mandelbrot@asbestoslegalcenter.org

<http://www.mesothelioma.pro>

<http://www.asbestoslegalcenter.org>

On Monday, December 6, 2021, 09:17:45 AM PST, Sciarrino, Becca <rebecca.sciarrino@mto.com> wrote:

Mr. Mandelbrot,

Thank you. 1:00 will work well. Is it okay if I initiate the call? I would like to conference in my colleague, Stuart Senator, and it will be easier if I initiate the call. Otherwise, my direct number is (415) 512-4097.

Best,

Rebecca

Rebecca L. Sciarrino ([she, her, hers](#)) | Munger, Tolles & Olson LLP
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From: Michael Mandelbrot <mandelbrot@asbestoslegalcenter.org>
Sent: Monday, December 6, 2021 9:11 AM
To: Sciarrino, Becca <Rebecca.Sciarrino@mto.com>

Cc: npauli@paulilaw.com; Smith, John G. <jgsmith@balch.com>; Senator, Stuart <Stuart.Senator@mto.com>

Subject: Re: Case No: 2:20-CV-112-KS-MTP - Response to Subpoena (Objection)

Ms. Sciarrino,

Thank you for your response. I will call you on Wednesday at 1 o'clock. Is there a direct line I should call?

Thanks,

Mike

Michael J. Mandelbrot

Mandelbrot Law Firm/Asbestos Legal Center

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<http://www.asbestoslegalcenter.org>

On Monday, December 6, 2021, 09:07:04 AM PST, Sciarrino, Becca <rebecca.sciarrino@mto.com> wrote:

Mr. Mandelbrot,

Thank you for your email. I will be in a mediation tomorrow. Are you available on Wednesday, December 8? Please let me know if there is a convenient time during any of the following windows:

- 9:30 a.m. - 10:30 a.m.
- 11:00 a.m. - noon
- 1:00 p.m. - 2:30 p.m.

Best,

Rebecca

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From: Michael Mandelbrot <mandelbrot@asbestoslegalcenter.org>

Sent: Monday, December 6, 2021 8:51 AM
To: Sciarrino, Becca <Rebecca.Sciarrino@mto.com>
Cc: npauli@paulilaw.com; Smith, John G. <jgsmith@balch.com>; Senator, Stuart <Stuart.Senator@mto.com>
Subject: Re: Case No: 2:20-CV-112-KS-MTP - Response to Subpoena (Objection)

Hi. Thank you for your email and letter. I received this late on Friday and have not had an opportunity to do some research yet. Please let me know your available times tomorrow, Tuesday, December 7, 2021.

Thanks,

Mike

Michael J. Mandelbrot

Mandelbrot Law Firm/Asbestos Legal Center

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<http://www.asbestoslegalcenter.org>

On Friday, December 3, 2021, 07:49:07 PM PST, Sciarrino, Becca <rebecca.sciarrino@mto.com> wrote:

Dear Mr. Mandelbrot,

Please see the attached correspondence.

Sincerely,

Rebecca

Rebecca L. Sciarrino ([she, her, hers](#)) | **Munger, Tolles & Olson LLP**
560 Mission Street | San Francisco, CA 94105
Tel: 415.512.4097 | rebecca.sciarrino@mto.com | www.mto.com

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From: Michael Mandelbrot <mandelbrot@asbestoslegalcenter.org>
Sent: Monday, November 29, 2021 12:43 PM
To: Sciarrino, Becca <Rebecca.Sciarrino@mto.com>
Cc: npauli@paulilaw.com; Smith, John G. <jgsmith@balch.com>; Senator, Stuart <Stuart.Senator@mto.com>
Subject: Re: Case No: 2:20-CV-112-KS-MTP - Response to Subpoena (Objection)

Dear Ms. Sciarrino,

Please allow this e-mail to serve as a response to your meet and confer letter of November 22, 2021. Note that I take these matter very seriously and do hope that these issues can be resolved without a Motion to Compel.

Timeliness of Objection:

I disagree that the Objection was untimely. Your office improperly served (at least) 6 copies of the Subpoena before properly serving the subpoena. No court has found any objection waived.

Undue Burden:

The cases you cite are inapplicable and none are authority over the cases which my office cited. Rembrandt Patent Innovations v. Apple, Inc., 2015 WL 4393581, at *2 (W.D. Tex. July 15, 2015) (holding subpoena issued to non-party is unduly burdensome “until and unless Plaintiffs can establish they are unable to obtain the requested information from the Defendant”); In re Allergan, 2016 WL 5922717, at *9 (C.D. Cal. Sept. 23, 2016) (“Courts are particularly reluctant to require a non-party to provide discovery that can be produced by a party” (citation omitted)); Nidec Corp. v. Victor Co. of Japan, 249 F.R.D. 575, 577 (N.D. Cal. 2007) (“There is simply no reason to burden nonparties when the documents sought are in possession of the party defendant.”); Moon v. SCP Pool Corp. 232 F.R.D. 633, 638 (C.D. Cal. 2005) (“[T]hese requests all pertain to defendant, who is a party, and, thus, plaintiffs can more easily and inexpensively obtain the documents from defendant, rather than from [the] nonparty”) (citing Dart Indus. Co. v. Westwood Chem. Co., 649 F.2d 646, 649 (9th Cir. 1980)); Haworth, Inc. v. Herman Miller, Inc., 998 F.2d 975, 978 (Fed. Cir. 1993) (affirming denial of motion to compel production from nonparty, holding “the district court could properly require [defendant] to seek discovery from its party opponent before burdening the nonparty [] with [an] ancillary proceeding”). Note that I have no “interest” in the outcome of the litigation other than to see justice prevail (as in any case).

Attorney-Client Privilege and Work Product Protection:

Nature of the withheld documents, communications, or tangible things:

- 1) E-mails with Dr. Durham regarding Ankura Audits; (07/06/2018-08/27/20)
- 2) E-mails with Dr. Durham regarding attorney Marla Eskin's history of lies, criminal conduct, misappropriation of Trust funds (07/06/2018-08/27/20);
- 3) E-mails with Dr. Durham regarding representation (07/06/2018-08/27/20);
- 4). E-mails with potential witnesses in Dr. Durham litigation (07/06/2018-08/27/20);
5. E-mails with Dr. Durham's Counsel in Mississippi (07/06/2018-08/27/20).

Please note that Dr. Durham agreed to have me work as his attorney (consultant) since 2017.

Without waiving any privileges or protections, I am attaching the one (and only) report done for my office's

clients by Dr. Durham. Dr. Durham did not charge me for this causation report.

Individual Subpoena:

All communications I've had with Dr. Durham have been as the Mandelbrot Law Firm and "Attorney Mike Mandelbrot". There is nothing to provide on the individual subpoena.

I'm more than happy to have further discussions on these issues.

Please provide my office with any and all communications (e-mails) and documents produced by Dr. Durham in the Ankura "sham audit" litigation. It is my understanding that your office has already received full 'esl' computer response related to "Mandelbrot".

Thanks,

Mike

Michael J. Mandelbrot

Mandelbrot Law Firm/Asbestos Legal Center

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<http://www.asbestoslegalcenter.org>

On Monday, November 22, 2021, 06:41:47 PM PST, Sciarrino, Becca <rebecca.sciarrino@mto.com> wrote:

Mr. Mandelbrot,

Please see the attached meet-and-confer correspondence.

Sincerely,

Rebecca

Rebecca L. Sciarrino ([she, her, hers](#)) | **Munger, Tolles & Olson LLP**
560 Mission Street | San Francisco, CA 94105
Tel: 415.512.4097 | rebecca.sciarrino@mto.com | www.mto.com

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From: Michael Mandelbrot <mandelbrot@asbestoslegalcenter.org>
Sent: Monday, November 15, 2021 8:32 AM
To: Sciarrino, Becca <Rebecca.Sciarrino@mto.com>
Cc: Norman Pauli <npauli@paulilaw.com>
Subject: Case No: 2:20-CV-112-KS-MTP - Response to Subpoena (Objection)

Case No: 2:20-CV-112-KS-MTP - Response to Subpoena (Objection)

Counsel,

I have received a subpoena in Case No: 2:20-CV-112-KS-MTP. Please allow this e-mail to serve as a timely "Response to Subpoena" and "Objection".

We hereby "Object" to the entirety of the Subpoena under Rule 45 based on the following:

1) Unduly Burdensome. See *Rembrandt Patent Innovations v. Apple, Inc.*, 2015 WL 4393581, at *2 (W.D. Tex. July 15, 2015) (holding subpoena issued to non-party is unduly burdensome "until and unless Plaintiffs can establish they are unable to obtain the requested information from the Defendant"); *In re Allergan*, 2016 WL 5922717, at *9 (C.D. Cal. Sept. 23, 2016) ("Courts are particularly reluctant to require a non-party to provide discovery that can be produced by a party" (citation omitted)); *Nidec Corp. v. Victor Co. of Japan*, 249 F.R.D. 575, 577 (N.D. Cal. 2007) ("There is simply no reason to burden nonparties when the documents sought are in possession of the party defendant."); *Moon v. SCP Pool Corp.* 232 F.R.D. 633, 638 (C.D. Cal. 2005) ("[T]hese requests all pertain to defendant, who is a party, and, thus, plaintiffs can more easily and inexpensively obtain the documents from defendant, rather than from [the] nonparty" (citing *Dart Indus. Co. v. Westwood Chem. Co.*, 649 F.2d 646, 649 (9th Cir. 1980))); *Haworth, Inc. v. Herman Miller, Inc.*, 998 F.2d 975, 978 (Fed. Cir. 1993) (affirming denial of motion to compel production from nonparty, holding "the district court could properly require [defendant] to seek discovery from its party opponent before burdening the nonparty [] with [an] ancillary proceeding").

2) Work Product/Attorney Client Privilege. Requires Disclosure of Protected or Privileged Material and No Exception of Waiver Applies (i.e. Strategy, Confidential Client Information).

Thanks,

Mike

Michael J. Mandelbrot

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E. MARTIN ESTRADA
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ELAINE J. GOLDENBERG*
MARK R. YOHALEM
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November 22, 2021

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LAUREN C. BARNETT
NICK R. SIDNEY
C. HUNTER HAYES
TREVOR N. TEMPLETON
SKYLAR B. GROVE
SARAH S. LEE
LAURA M. LOPEZ
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ANDREW W. BREWSTER III
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HUNTER V. ARMOUR
NATHANIEL F. BUGSMAN
PAUL E. MARTIN
REBECCA L. SCIARRINO
CORY M. BATZA
BRIAN R. BOESSENECKER
AVI REJWAN OVED
ROBERT E. BOWEN
RICHARD T. JOHNSON
GRACE DAVIS FISHER
CALEB W. PEIFFER
ANDRES CANTERO, JR.
JAMIE B. LUGURI
WILLIAM M. ORR

OF COUNSEL
ROBERT K. JOHNSON
PATRICK J. CAFFERTY, JR.
PETER A. DETRE
BRAD SCHNEIDER
PETER E. GRATZINGER
JENNY H. HONG
KIMBERLY A. CHI
ADAM R. LAWTON
MICHAEL E. GREANEY
SARAH J. COLE

E. LEROY TOLLES
(1922-2008)

*ADMITTED IN DC.
ALL OTHERS ADMITTED IN CA

Writer's Direct Contact
(415) 512-4097
Rebecca.Sciarrino@mto.com

VIA E-MAIL

Michael J. Mandelbrot
Mandelbrot Law Firm
Asbestos Legal Center
1223 Grant Avenue #C
Novato, CA 94945

Re: Case No. 2:20-CV-112-KS-MTP, Asbestos Legal Center and Mandelbrot Law Firm Subpoenas

Dear Mr. Mandelbrot:

I am in receipt of your November 15, 2021 email objecting to the subpoenas served on Mandelbrot Law Firm and Asbestos Legal Center (“the Entity Subpoenas”). As stated below, those objections are not well taken. Please consider this letter the commencement of a meet and confer to determine whether these subpoenas can be resolved without a motion to compel.

Timeliness of Objections

The Entity Subpoenas set a compliance date of November 12, 2021 at 10:00 a.m. Federal Rule of Civil Procedure 45(d)(2)(B) requires that objections “be served before the earlier of the time specified for compliance or 14 days after the subpoena is served.” The November 15 objections were untimely. “A non-party’s failure to timely make objections to a Rule 45 subpoena duces tecum generally requires the court to find that any objection has been waived.”

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Michael J. Mandelbrot
November 22, 2021
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Baker v. Ensign, No. 11-CV-2060-BAS (WVG), 2014 WL 3058323, at *6 (S.D. Cal. July 3, 2014).

Objection #1 – Undue Burden

“[T]here is no general rule that plaintiffs cannot seek nonparty discovery of documents likely to be in defendants’ possession.” *Gonzalez-Tzita v. City of Los Angeles*, No. CV 16-0194 FMO (EX), 2018 WL 10111333, at *2 (C.D. Cal. Sept. 30, 2018). Your Objections contain no showing of any actual significant burden of compliance. *Cf. Viacom Int’l, Inc. v. YouTube, Inc.*, No. C 08-80129 SI, 2008 WL 3876142, at *3 (N.D. Cal. Aug. 18, 2008) (explaining that request in *Moon v. SCP Pool Corp.*, 232 F.R.D. 633, 637-38 (C.D. Cal. 2005) “covered a period of more than 10 years and extended far beyond the pertinent geographic region”). *Compare In re Allergan*, No. 14-cv-02004-DOC (KES), 2016 WL 5922717, at *8-9 (C.D. Cal. Sept. 23, 2016) (relevance of requests was “entirely speculative,” or documents were already in the possession of the requestor).

Likewise, this discovery will help ensure a complete document set. *See Gonzalez-Tzita*, 2018 WL 10111333, at *2. Your law firm also appears to have an interest in the outcome of the litigation. *See Software Rts. Archive, LLC v. Google, Inc.*, Nos. 2:07-CV-611 (CE), CV08-03172RMW, 2009 WL 1438249, at *2 (D. Del. May 21, 2009).

Objection #2 – Attorney-Client Privilege and Work Product Protection

Rule 45 requires that privilege-based objections must “describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.” Fed. R. Civ. P. 45(e)(2)(A)(ii). *Accord N.L.R.B. v. Fresh & Easy Neighborhood Mkt., Inc.*, 805 F.3d 1155, 1163 n.4 (9th Cir. 2015). All you have provided is a “[b]oilerplate, generalized objection[.]” that is “inadequate and tantamount to making no objection at all.” *Exobox Techs. Corp. v. Tsambis*, No. 2:14-CV-501-RFB-VCF, 2014 WL 4987903, at *3 (D. Nev. Oct. 7, 2014). It is also far from clear why any requested documents would be covered by either the attorney-client privilege or the work product protection.

Individual Subpoena

Finally, I note that we have received notice that the subpoena to you individually has now been served. As you know, it seeks the same categories of documents as the Entity Subpoenas. Please let me know if your position on the individual subpoena will be any different from your position on the Entity Subpoenas.

Please let me know if you would like to have a further discussion of these issues, to which we are of course open if it might help resolve the subpoenas.

MUNGER, TOLLES & OLSON LLP

Michael J. Mandelbrot
November 22, 2021
Page 3

Very truly yours,

A handwritten signature in blue ink that reads "Rebecca L. Sciarrino". The signature is written in a cursive, flowing style.

Rebecca L. Sciarrino

cc: Norman Pauli
John Smith
Stuart N. Senator

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December 3, 2021

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(415) 512-4097
Rebecca.Sciarrino@mto.com

VIA E-MAIL

Michael J. Mandelbrot
Mandelbrot Law Firm
Asbestos Legal Center
1223 Grant Avenue #C
Novato, CA 94945

Re: Case No. 2:20-CV-112-KS-MTP, Subpoenas to Asbestos Legal Center,
Mandelbrot Law Firm, and Michael J. Mandelbrot

Dear Mr. Mandelbrot:

I am in receipt of your November 29, 2021 email objecting to the subpoenas
served on Mandelbrot Law Firm, Asbestos Legal Center, and you individually (collectively, "the
Subpoenas"), and I write now in hopes that we can resolve the subpoenas without a motion to
compel. But if after you review this letter, you continue to be unwilling to produce the requested
documents, I request a prompt oral discussion of these issues.

Timeliness of Objections

Federal Rule of Civil Procedure 45 states that objections are to "be served before
the earlier of the time specified for compliance or 14 days after the subpoena is served." In this
case, the time for compliance was November 12, 2021 at 10:00 a.m. The fact that you were
provided copies of the Subpoenas before they were served does not change the time for you to
object. The fact that you were aware that Ankura was seeking discovery before you were served

MUNGER, TOLLES & OLSON LLP

Michael J. Mandelbrot
December 3, 2021
Page 2

also demonstrates that you had ample notice of the discovery sought and should have been able to respond before the November 12 compliance date.

Undue Burden

“The scope of discovery under a subpoena issued pursuant to Rule 45 is the same as the scope of discovery allowed under Rule 26(b)(1)—material that is relevant to a claim or defense of any party.” *Playstudios, Inc. v. Centerboard Advisors, Inc.*, No. 218CV01423JCMNJK, 2019 WL 8128168, at *2 (D. Nev. July 18, 2019), adhered to on denial of reconsideration, No. 218CV1423JCMNJK, 2019 WL 6493926 (D. Nev. Dec. 3, 2019). Your objections do not show any burden of compliance but, rather, suggest that there is a rule against seeking discovery from non-parties if a party might also possess the relevant documents. But “there is no general rule that plaintiffs cannot seek nonparty discovery of documents likely to be in defendants’ possession.” *Gonzalez-Tzita v. City of Los Angeles*, No. CV-16-0194 FMO (EX), 2018 WL 10111333, at *2 (C.D. Cal. Sept. 30, 2018).

As previously explained, this discovery will help to ensure a complete document set, *see id.* at *2, and you and your law firm appear interested in this litigation, *see Software Rts. Archive, LLC v. Google, Inc.*, Nos. 2:07-CV-611 (CE), CV08-03172RMW, 2009 WL 1438249, at *2 (D. Del. May 21, 2009).

Attorney-Client Privilege

You claim now that you have been acting as Dr. Durham’s “attorney (consultant).” But you have not provided any detail regarding the nature or scope of this claimed attorney/client relationship. Moreover, Dr. Durham has not asserted such a relationship with you when asked for communications with you, and there cannot have been an attorney/client relationship without Dr. Durham’s understanding and agreement that such a relationship was in effect. Even if there were a demonstrated attorney/client relationship, that would not mean that your communications with Dr. Durham are all privileged, and you have not provided sufficient information to “enable the parties to assess the claim” of privilege with respect to any particular documents. Fed. R. Civ. P. 45(e)(2)(A)(ii). “A nonparty withholding subpoenaed information on the grounds of privilege must serve a privilege log describing the nature of the documents withheld so that the other parties may assess the privilege claimed.” *Realtek Semiconductor Corp. v. LSI Corp.*, No. 5:14MC80197BLFPSG, 2014 WL 4365114, at *2 (N.D. Cal. Sept. 3, 2014). You have not yet provided a privilege log.

Moreover, your claim of privilege is belied by the fact that Dr. Durham has produced email correspondence with you during the period in question, and that correspondence does not seek or obtain legal advice from you, or otherwise evidence an attorney/client relationship. Indeed, the tenor of the correspondence is that there was and is no such relationship.

MUNGER, TOLLES & OLSON LLP

Michael J. Mandelbrot
December 3, 2021
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Further Discussion

Please let me know your availability for a telephone call on Monday, December 6, 2021 during any of the following windows: 9:00-9:30 a.m., 10:00-11:00 a.m., 11:30 a.m.-12:00 p.m., or any time after 3:00 p.m.

Very truly yours,

A handwritten signature in blue ink that reads "Rebecca L. Sciarrino". The signature is written in a cursive, flowing style.

Rebecca L. Sciarrino

RLS

cc: Normal Pauli
John Smith
Stuart N. Senator

EXHIBIT B

Sciarrino, Becca

From: Sciarrino, Becca
Sent: Wednesday, December 8, 2021 3:57 PM
To: Michael Mandelbrot
Cc: npauli@paulilaw.com; Smith, John G.; Senator, Stuart
Subject: RE: Meet and Confer December 8, 2021

Dear Mr. Mandelbrot,

Thank you for your email. To clarify, our view on what occurred during the meet and confer discussion today differs from what you stated. You attacked the ethics and integrity of Ankura and the Trusts, a subject on which we did not believe it necessary or appropriate to engage despite our disagreement. Also, you did not provide any additional basis for your position that the subpoenas pose an undue burden and, as we pointed out, we believe that your proposal that you would go through Dr. Durham's production, compare it to your responsive emails (you confirmed that your responsive documents are only emails), and identify anything omitted and produce it, would be even more burdensome. For that reason, we do not and did not "agree" that the process of your pursuing that with Dr. Durham would ensure a low burden on your office. We also told you that we will make ourselves available for a call on Friday, but that we do not believe it is appropriate to delay our motion based on our discussion today. Also, you did not propose a specific time to speak on Friday and we did not refuse to set a specific time -- though we did say we did not believe it necessary to set a specific time now. If you would like now to set a specific time on Friday, we would propose that it be within the windows of 9-11:30 am or early afternoon.

Sincerely,

Rebecca

Rebecca L. Sciarrino ([she, her, hers](#)) | Munger, Tolles & Olson LLP
560 Mission Street | San Francisco, CA 94105
Tel: 415.512.4097 | rebecca.sciarrino@mto.com | www.mto.com

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From: Michael Mandelbrot <mandelbrot@asbestoslegalcenter.org>
Sent: Wednesday, December 8, 2021 2:09 PM
To: Sciarrino, Becca <Rebecca.Sciarrino@mto.com>
Cc: npauli@paulilaw.com; Smith, John G. <jgsmith@balch.com>; Senator, Stuart <Stuart.Senator@mto.com>
Subject: Meet and Confer December 8, 2021

Counsel,

Please allow this e-mail to confirm our discussion today regarding the production of e-mails by my non-party office.

In our call, we agreed that I would speak with Dr. Durham and his Counsel to determine the extent of their production to ensure the burden is low on my office.

While your office refused to set a specific time to speak again on these issues, I suggested Friday December 10, 2021.

Without waiving any privileges, protections, or objections, I am producing/attaching (in good faith) the attached correspondence responsive to your subpoena.

Thanks,

Mike

Michael J. Mandelbrot
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EXHIBIT C

Free Consultation: **800.970.3878**

DECEMBER 8, 2021

Munger, Tolles & Olson LLP — The “Enablers” of Asbestos Trust Fraud (Stuart Senator, Becca Sciarrino)

by Asbestos Legal Center

Munger, Tolles & Olson LLP — The “Enablers” of Asbestos Trust Fraud (Stuart Senator, Becca Sciarrino) —

The “Enablers” of Asbestos Trust Fraud (Stuart Senator, Becca Sciarrino)

Munger, Tolles & Olson LLP tout themselves as “Big Law”. False.

Munger, Tolles & Olson LLP ‘defines’ corruption. No Law Firm in America ‘enables’ fraud, theft and corruption more than Munger Tolles & Olson LLP

The Truth – Munger, Tolles & Olson LLP engages in corruption, fraud, and misappropriation of funds. To wit:

- No U.S. Law Firm in 2021 has been *more instrumental* in Asbestos Trust Corruption and Fraud than Munger, Tolles & Olson LLP.
- No U.S. Law Firm in 2021 (excessively) billed Asbestos Trusts more than Munger, Tolles & Olson LLP lawyers
Stuart Senator and Becca Sciarrino – thus misappropriating/stealing *millions* from Asbestos Victims (to further Trust Fraud)
- No U.S. Law Firm in 2021 (except Munger, Tolles & Olson LLP) would represent Ankura Consulting LLC (The “Kings of Asbestos Trust Fraud and Theft”) – who wrongfully banned multiple esteemed Doctors from Asbestos Trusts to further Trust fund theft. Munger, Tolles & Olson LLP was ‘happy’ to represent Ankura Consulting LLC. so they could excessively bill Asbestos Trusts (millions stolen from victims...).

Munger, Tolles & Olson LLP ‘biggest’ Asbestos Trust Fund client in 2021 was none other than **Ankura Consulting LLC** (Washington D.C.’s Most Corrupt Company). Ankura engages in sexual harassment. Ankura engages in racial discrimination. And even worse, Ankura Consulting engages in extensive corruption, fraud, insider

dealing and theft (at least \$100 million dollars). And who does Ankura hire to defend them? **Munger, Tolles & Olson LLP! Any decent Law Firm would reject this client. Not Munger, Tolles & Olson LLP. Munger, Tolles & Olson LLP will jump at any chance to bill/steal/misappropriate Asbestos Trust Funds.**

Simply put, Munger, Tolles & Olson is the U.S. Law Firm to hire IF you want engage in corruption, fraud, theft, and insider dealing...and get away with it.

Here's a picture of the most corrupt lawyer at Munger Tolles & Olson – Stuart Senator

Stuart Senator – Munger Tolles & Olson Most Corrupt Lawyer – King of Fraud



and Asbestos Trust Fund Theft

Posted in: @kazanlaw.com, Alan R. Brayton, Alan R. Brayton Asbestos, Asbestos, Asbestos Fraud, Asbestos Mafia, Gary Fergus Corrupt Lawyer, Kazan fraud, Steven Kazan and Steven Kazan Asbestos
Tagged: ankura, Ankura Consulting Corruption, Ankura Consulting LLC, Ankura Corruption, Becca Sciarrino, Munger, Stuart Senator, Tolles & Olson LLP and Tolles & Olson LLP -- The "Enablers" of Asbestos Trust Fraud (Stuart Senator

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