

COMPOSITE

EXHIBIT 2

Email Correspondence Between
Marc Randazza and Steve Mastrantonio



From: Marc Randazza mjr@randazza.com

Subject: Availability for Depositions

Date: October 12, 2014 at 7:01 PM

To: Steve Mastrantonio mastrantonio@nwm-law.com

Cc: Theresa Haar tmh@randazza.com, Karen Lefton karen@theleftongroup.com

Bcc: Jane Litte litte.jane@gmail.com

Steve,

What kind of availability do you have for depositions of Tina Engler and Patricia Marks, with enough time for us to get the transcripts for the hearing?

And, I presume that both depositions could be scheduled in Akron, perhaps both on the same day? I would not expect them to take more than a few hours each.

--

Marc John Randazza, JD, MAMC, LLM* | Randazza Legal Group

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From: Marc Randazza mjr@randazza.com
Subject: Re: Deposition
Date: October 16, 2014 at 8:25 AM
To: Steve Mastrantonio mastrantonio@nwm-law.com

Well that sucks!

Have you pondered the idea of a "deposition party" where we bring all three potential deponents together in the same place?

On Thu, Oct 16, 2014 at 7:40 AM, Steve Mastrantonio <mastrantonio@nwm-law.com> wrote:

Marc,
I'm taking to Tina this afternoon. I will have answers for you by no later than 3pm today.

Btw, when you fly in you might want to fly in through the Akron airport as the Ebola patient just went through the Cleveland airport this week.

Sincerely,

Steven W. Mastrantonio, Esq.
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& Mastrantonio, LLP
23 S. Main St., 3rd Floor
Akron, Ohio 44308
[330 434 1000](tel:3304341000) (Office)
[330 958 0486](tel:3309580486) (Cell)
mastrantonio@nwm-law.com

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

From: Marc Randazza
Date: 10/15/2014 9:07 PM (GMT-05:00)
To: Steve Mastrantonio
Subject: Deposition

Steve,

What do you want to do about depositions? Should I just subpoena Tina Engler? I realize that you do not represent her, but I don't want to do that without coordinating it with you.

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From: Steve Mastrantonio mastrantonio@nwm-law.com 
Subject: RE: Subpoena to Engler
Date: October 17, 2014 at 2:41 PM
To: Marc Randazza mjr@randazza.com
Cc: Karen Lefton karen@thelleftongroup.com, Theresa Haar tmh@randazza.com

Marc,

Thank you for the courtesy. You can serve Tina directly, just send me a copy of the subpoena. As for depositions, I am willing to do Ms. Lampe's via skype. If you would like to depose Patty Marks via Skype as well, let me know. Wednesday or Friday would work best for me.

As we discussed, these depositions would not be a bar to future depositions. As for witness lists, I propose that we exchange them on Monday. However, I cannot agree to the terms in your letter without knowing the nature of witness's testimony. It's my understanding that there are a few authors already in violation of their contracts and I would be doing my client a disservice if I were to grant a broad release before knowing who they are. If you want to provide me with a summary of their testimony, I can consider a limited release as to matters relating to that testimony.

Sincerely,

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From: Marc Randazza [<mailto:mjr@randazza.com>]
Sent: Friday, October 17, 2014 3:46 PM
To: Steve Mastrantonio

To: Steve Masturanto

Cc: Karen Lefton; Theresa Haar

Subject: Subpoena to Engler

Steve,

As you've stated you do not represent Engler, it seems ok for us to send a subpoena to her directly.

But, I do not wish to be discourteous to you. If you would like to accept it on her behalf, without waiving your position that you do not represent her directly, I would be fine with serving it to you.

What would you prefer?

--

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From: Marc Randazza mjr@randazza.com
Subject: Jasmine-Jade Productions PMK
Date: February 26, 2015 at 4:22 PM
To: Steve Mastrantonio mastrantonio@nwm-law.com

Steve,

Can you give me a few dates for a deposition of the PMK at Jasmine-Jade Productions?

I presume that is Tina Engler, but your call on who you want to put up. Let me know where we can depose them.

--

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