

Colleen M. McGurrin

From: Gloria L. Castro ← Kamalattar's Deputy
Sent: Monday, November 03, 2014 5:59 PM
To: Robert Bell
Cc: Colleen M. McGurrin
Subject: RE: Uzun, Guven, M.D. / ProLaw Matter ID No. LA2014614571

Yeah, give him the old heave ho. Defend Colleen, refer him back to MBC, and note that we can't take the complaint as it is against our client—among other things. Gloria

From: Robert Bell
Sent: Monday, November 03, 2014 4:21 PM
To: Gloria L. Castro
Cc: Colleen M. McGurrin
Subject: RE: Uzun, Guven, M.D. / ProLaw Matter ID No. LA2014614571

Gloria,

So you know, this screed is nearly a point-for-point reprise of Dr. Markman's complaints against MBC and our DAG in the case recently handled by DAG Terry Barack. We are in discussion with Barack now so as to get a firmer grip on defenses of this sort in Federal court.

However, as we are the attorney for most of the people named in his letter (and the employer) of another potential defendant, my inclination is to decline, in polite terms, to engage him substantively. In other words, I propose to write a brief, one-paragraph dust-off. I certainly would not like to provide him with any affirmative statements that he might later seek to twist should he take the plunge and actually sue. Are you OK with that?

Also, I am assuming that DOJ management is not looking for a rebuttal, privately, from us, about these allegations? Am I correct about that?

Kim

→ Kamalattar's Deputy
From: Gloria L. Castro
Sent: Monday, November 03, 2014 3:05 PM
To: Casey Hallinan; Colleen M. McGurrin
Cc: Robert Bell
Subject: RE: Uzun, Guven, M.D. / ProLaw Matter ID No. LA2014614571
Importance: High

Thanks Casey! We will have Robert Bell draft a response for my signature. Once we get that out, we will forward a courtesy copy to you.

From: Casey Hallinan
Sent: Monday, November 03, 2014 3:00 PM
To: Colleen M. McGurrin
Cc: Robert Bell; Gloria L. Castro
Subject: Uzun, Guven, M.D. / ProLaw Matter ID No. LA2014614571

Hi Colleen,

Please see the attached correspondence that we received today from Dr. Guven Uzun. I am forwarding this to you for handling as you deem appropriate.

Please advise as to whether or not the pdf will suffice, or if you prefer that I route you the originals.

Thanks,

Casey Hallinan, AGPA
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