

Exhibit E

Ray Beckerman

From: Ray Beckerman
Sent: Tuesday, June 20, 2006 2:06 PM
To: Richard Gabriel; Ray Beckerman
Cc: mtrogers@VANFELIU.com; Jensen, Christopher; Penney, Maryann; Belomlinsky, Polena; Timothy M Reynolds
Subject: RE: Discovery issues

Dear Richard

I was very disturbed by your voice mail which gave me unilateral drop-dead short-notice dates for the depositions and computer inspection, and you grossly mischaracterize what has been going on between us. It appears as though you have been trying to 'set me up'.

Mirror imaging:

I have been ready to schedule the hard drive mirror imaging as soon as (a) you would tell me whether you needed the tower or not, (b) you would tell me how long the imaging would take, and (c) we would have an appropriate stipulation entered into. I am still waiting for (b) and (c) and did not receive your answer to (a) until your drop-dead voice mail message earlier this afternoon. On the stipulation we were in agreement on paragraphs 1 to 6 but you refused my paragraph 7 and refused to suggest an alternative which would protect defendant's legitimate interests in ensuring (1) her right to meaningful pretrial discovery on the imaging if it is going to be used at trial, and (2) her right to avoid the expense of such discovery if it isn't. I was assuming we would place this issue before the Magistrate for him to decide.

Depositions:

We reached agreement a week or two ago on the duration, etc. of the depositions of Ms. Lindor and her son. It has been about a week since you asked to schedule the depositions. I have been trying to get my client's and Mr. Raymond's availability, and will do so again today. To imperiously dictate dates to a fellow practicing lawyer who is every bit as busy as you are is most disrespectful, discourteous, and unprofessional. I have endeavored to get you dates and will continue to do so.

Defendant's Unanswered Written Discovery Requests:

You said you were going to send me an outline of your position and you just did. I have all day depositions tomorrow and possibly Thursday in another matter, but will endeavor to go over the outline today and finalize where we are. This is a delay that was created solely by you due to your refusal to answer these discovery requests in the first place.

Just when I think you're starting to conduct yourself in an appropriate manner, you pull something like this. Shame on you.

Ray

Ray Beckerman
Vandenberg & Feliu LLP
110 East 42 St.