

From: (b)(6);(b)(7)(C)
Sent: 19 Jan 2018 10:58:58 -0500
To: (b)(6);(b)(7)(C)
Subject: FW: Menocal Hot Lit Update

(b)(6);(b)(7)(C) here's one of the old e-mails on the (b)(6);(b)(7)(C) issue. I'll forward a few more too...

(b)(6);(b)(7)(C)
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From: (b)(6);(b)(7)(C)
Sent: Thursday, April 20, 2017 3:44 PM
To: (b)(6);(b)(7)(C)
Subject: RE: Menocal Hot Lit Update

Yes, agreed that it's problematic (b)(6);(b)(7)(C) is out this week so I haven't had a chance to discuss with her, but I hope to on Monday. I will let you know what she says.

Thanks!

(b)(6);(b)(7)(C)

From: (b)(6);(b)(7)(C)
Sent: Thursday, April 20, 2017 3:29 PM
To: (b)(6);(b)(7)(C)
Subject: RE: Menocal Hot Lit Update

Thanks (b)(6);(b)(7)(C) Sorry for the quick turn on it...

(b)(5)

(b)(5)

(b)(6);(b)(7)(C)

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From: (b)(6);(b)(7)(C)
Sent: Thursday, April 20, 2017 3:17 PM
To: (b)(6);(b)(7)(C)
Subject: RE: Menocal Hot Lit Update

Thanks (b)(6);(b)(7)(C) this looks fine to me. Of course I defer to DCLD and GILD on any/all Touhy and discovery issues. And you put the answer to #3 well.

Thanks again!

(b)(6);(b)(7)(C)

From: (b)(6);(b)(7)(C)
Sent: Thursday, April 20, 2017 2:37 PM
To: (b)(6);(b)(7)(C)
Subject: RE: Menocal Hot Lit Update

Inputs are still welcome (b)(6);(b)(7)(C) if you can. I sent this version (attached) a bit ago but could probably still catch concerns if you had any...

(b)(6);(b)(7)(C)

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From: (b)(6);(b)(7)(V)
Sent: Thursday, April 20, 2017 2:36 PM
To: (b)(6);(b)(7)(C)
Subject: RE: Menocal Hot Lit Update

Hi (b)(6) so sorry, I was at the NCCIC in Arlington; just got back and am reviewing this now, although I know I've missed your 1:30 deadline . . .

From: (b)(6);(b)(7)(C)
Sent: Thursday, April 20, 2017 12:26 PM
To: (b)(6);(b)(7)(C)
Subject: RE: Menocal Hot Lit Update

Colleagues, the attached is a distillation of your inputs last week (and lots of other stray voltage!)

Please review and correct anything necessary. We are way over the typical 2-page input, but think we'll get special dispensation this time, for this information...but don't want to add more unless critical.

Appreciate your views, if any, by 1:30.

Thanks,

(b)(6);(b)(7)(C)

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From: (b)(6);(b)(7)(C)
Sent: Thursday, April 20, 2017 11:35 AM
To: (b)(6);(b)(7)(C)
Cc: (b)(6);(b)(7)(C)
Subject: RE: Menocal Hot Lit Update

(b)(6);(b)(7)(C) and Moira have asked me to rework this in order to tee up the (b)(6);(b)(7)(C) questions directly, and to address (b)(6);(b)(7)(C) concern about contact plaintiff's counsel. Does she still want that in light of (b)(6);(b)(7)(C) e-mail yesterday? Either way, this will become a "decision point" update rather than an FYI.

(b)(6);(b)(7)(C) I will send to you as well once I've drafted. I should have something by 1230 and owe to my leaders by 1330 (sorry!)

(b)(6);(b)(7)(C)

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From: (b)(6);(b)(7)(C)
Sent: Thursday, April 20, 2017 9:55 AM
To: (b)(6);(b)(7)(C)
Subject: RE: Doc Reviews

(b)(6);(b)(7)(C)

See attached. I removed a few sentences from the Touhy portion of the report.

(b)(6);(b)(7)(C)

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Email: (b)(6);(b)(7)(C)

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From: (b)(6);(b)(7)(C)
Sent: Wednesday, April 19, 2017 5:51 PM
To: (b)(6);(b)(7)(C)
Cc:
Subject: RE: Doc Reviews

(b)(6);(b)(7)(C)

I've adopted virtually all of our changes. Do the few remaining suggestions work for you?

This is now ½ page too long. Grateful for any suggestions on where we could cut!

Thanks,

(b)(6);(b)(7)(C)

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From: (b)(6);(b)(7)(C)
Sent: Wednesday, April 19, 2017 12:51 PM
To: (b)(6);(b)(7)(C)
Subject: RE: Doc Reviews

(b)(6);(b)(7)(C)

See attached edits to HotLit report. GILD will be present at the HotLit briefing and prefers to speak to any Touhy related issues. Please let me know if you have any questions. I will send the Touhy issues doc shortly. Thanks

(b)(6);(b)(7)(C)

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From: (b)(6);(b)(7)(C)
Sent: Wednesday, April 19, 2017 11:59 AM
To: (b)(6);(b)(7)(C)
Subject: RE: Doc Reviews

Thanks for the update. Don't worry about the hot lit doc for now...

(b)(6);(b)(7)(C)

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From: (b)(6);(b)(7)(C)
Sent: Wednesday, April 19, 2017 11:58 AM
To: (b)(6);(b)(7)(C)
Subject: RE: Doc Reviews

(b)(6);(b)(7)(C)

I may need a little more time to review/edit.

(b)(6);(b)(7)(C)

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From: (b)(6);(b)(7)(C)
Sent: Wednesday, April 19, 2017 10:13 AM
To: (b)(6);(b)(7)(C)
Subject: RE: Doc Reviews

Hey (b)(6);(b)(7)(C) please add redlines to anything in the attached that you'd like to correct.

The priority is the "Touhy issues" doc, but I've also attached an updated Hot Lit report which I owe my leadership tomorrow.

Happy to discuss as helpful.

Many thanks,

(b)(6);(b)(7)(C)

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From: (b)(6);(b)(7)(C)
Sent: Wednesday, April 19, 2017 9:06 AM
To: (b)(6);(b)(7)(C)
Subject: RE: Doc Reviews

Yes, that works.

(b)(6);(b)(7)(C)
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Cell: 202-816-(b)(6);(b)
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From: (b)(6);(b)(7)(C)
Sent: Wednesday, April 19, 2017 9:03 AM
To: (b)(6);(b)(7)(C)
Subject: Doc Reviews

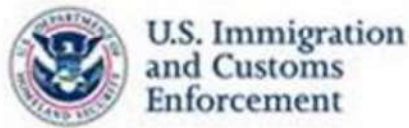
Hey (b)(6);(b)(7)(C)

I have gone thru the flood of e-mails and docs you and (b)(6);(b)(7)(C) have forwarded on Menocal. I am going to send you a draft Hot Lit report and an updated input from GILD to DCLD (as we discussed Monday) that captures more history on Touhy/discovery issues. I should have that to you by 1000 or 1030. Would you be able to get it back to me by 1200? We are briefing (b)(6);(b)(7)(C) on it later today...

Thanks,

(b)(6);(b)(7)(C)

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From: (b)(6);(b)(7)(C)
Sent: 20 Feb 2018 12:58:23 -0500
To: (b)(6);(b)(7)(C)
Subject: FW: Menocal Outline - Rehearing En Banc
Attachments: (draft) Menocal Rehearing Outline.docx

For today's meeting...

(b)(6);(b)(7)(C) Associate Legal Advisor
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From: (b)(6);(b)(7)(C)
Sent: Friday, February 16, 2018 4:36 PM
To: (b)(6);(b)(7)(C) (CIV)
(b)(6);(b)(7)(C)
Cc: (b)(6);(b)(7)(C)
Subject: Menocal Outline - Rehearing En Banc

Dear (b)(6);(b)(7)(C)

Hope all is well. Thank you so much again for our conversation yesterday, Here is the outline of the en

(b)(5)

Many thanks,

(b)(6);(b)(7)(C)

Holland & Knight

Partner

Holland & Knight LLP

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(b)(6);(b)(7)(C) | www.hklaw.com

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