

EXHIBIT A

From: [Todd Gregorian](#)
To: [Jeffrey Gersh](#); [Michael Sherman](#)
Cc: [Viviana Boero Hedrick](#); [David Hadden](#); [Chieh Tung](#); jlamken@mololamken.com
Subject: RE: In Re: PersonalWeb Technologies, LLC
Date: Friday, April 23, 2021 11:22:00 AM

Jeff,

In connection with the post-judgment proceedings, today I intend to request a CMC before Judge Freeman. Do any counsel plan to attend on behalf of PersonalWeb?

Thank you,
-t

From: Jeffrey Gersh <jgersh@stubbsalderton.com>
Sent: Friday, April 23, 2021 10:30 AM
To: Todd Gregorian <TGregorian@fenwick.com>; Michael Sherman <masherman@stubbsalderton.com>
Cc: Viviana Boero Hedrick <vhedrick@stubbsalderton.com>; David Hadden <DHadden@fenwick.com>; Chieh Tung <ctung@fenwick.com>; jlamken@mololamken.com
Subject: RE: In Re: PersonalWeb Technologies, LLC

**** EXTERNAL EMAIL ****

Todd

My understanding is all the MDL cases are done, judgment entered and the file closed. We are handling the appeals and there is nothing further in the MDL happening. I never said a new case filing was required. We are not counsel in the post judgment proceedings for Pweb and have not agreed to accept service of any post judgment docs nor has our client consented to same.

JG

Jeffrey F. Gersh
Partner, Stubbs Alderton & Markiles, LLP
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From: Todd Gregorian <TGregorian@fenwick.com>
Sent: Thursday, April 22, 2021 9:55 PM
To: Jeffrey Gersh <jgersh@stubbsalderton.com>; Michael Sherman <masherman@stubbsalderton.com>
Cc: Viviana Boero Hedrick <vhedrick@stubbsalderton.com>; David Hadden <DHadden@fenwick.com>; Chieh Tung <ctung@fenwick.com>; jlamken@mololamken.com
Subject: RE: In Re: PersonalWeb Technologies, LLC

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Jeff

I am not sure I follow. Stubbs Alderton is still counsel of record in the MDL. Under FRCP 69, California enforcement rules apply, and in California the discovery in aid of enforcement is part of the original action -- no new case filing is required. So PersonalWeb was properly served. Please let me know whether you will withdraw your objection, or if we will need to raise this with the Court.

Thank you,

Todd Gregorian

Fenwick | Partner | 415-875-2402 | tgregorian@fenwick.com

From: Jeffrey Gersh <jgersh@stubbsalderton.com>
Sent: Thursday, April 22, 2021 9:08 PM
To: Todd Gregorian <TGregorian@fenwick.com>; Michael Sherman <masherman@stubbsalderton.com>
Cc: Viviana Boero Hedrick <vhedrick@stubbsalderton.com>; David Hadden <DHadden@fenwick.com>; Chieh Tung <ctung@fenwick.com>; jlamken@mololamken.com
Subject: RE: In Re: PersonalWeb Technologies, LLC

**** EXTERNAL EMAIL ****

Todd

We do not represent Pweb in the post judgment proceedings. You have no authority to serve us with any documents relating thereto.

Jeff

Jeffrey F. Gersh

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From: Todd Gregorian <TGregorian@fenwick.com>
Sent: Wednesday, April 21, 2021 7:46 AM
To: Jeffrey Gersh <jgersh@stubbsalderton.com>; Michael Sherman <masherman@stubbsalderton.com>
Cc: Viviana Boero Hedrick <vhedrick@stubbsalderton.com>; David Hadden <DHadden@fenwick.com>; Chieh Tung <ctung@fenwick.com>; jlamken@mololamken.com
Subject: RE: In Re: PersonalWeb Technologies, LLC

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Jeff and Michael,

It is a bit disappointing, given PersonalWeb's aggression in demanding responses to its own issues throughout the case, that it now will not provide the courtesy of a timely response. In addition to the matters discussed below, I have the

following additional issues to address:

- By now you have seen our discovery requests in aid of enforcement. While PersonalWeb has the usual period to provide a formal response to those, I would ask you separately to identify by close of business today any PersonalWeb bank or financial accounts, including current balances, so that our enforcement of the judgment is not further delayed.
- Amazon and Twitch intend to apply *ex parte* to take the debtor's examination of PersonalWeb. Please let me know if PersonalWeb will oppose this relief, and if so, on what grounds. I am available to confer after 2pm today or tomorrow before noon.

Thank you,

Todd Gregorian

Fenwick | Partner | 415-875-2402 | tgregorian@fenwick.com

From: Todd Gregorian

Sent: Monday, April 19, 2021 6:36 PM

To: 'Jeffrey Gersh' <jgersh@stubbsalderton.com>; 'Michael Sherman' <masherman@stubbsalderton.com>

Cc: 'Viviana Boero Hedrick' <vhedrick@stubbsalderton.com>; David Hadden <DHadden@fenwick.com>

Subject: RE: In Re: PersonalWeb Technologies, LLC

Jeff,

Following up on my request. Please let us know whether PersonalWeb will pay the judgment or post a bond, and answer my other questions below.

Todd Gregorian

Fenwick | Partner | 415-875-2402 | tgregorian@fenwick.com

From: Todd Gregorian

Sent: Saturday, April 17, 2021 12:28 PM

To: Jeffrey Gersh <jgersh@stubbsalderton.com>; Michael Sherman <masherman@stubbsalderton.com>

Cc: Viviana Boero Hedrick <vhedrick@stubbsalderton.com>; David Hadden <DHadden@fenwick.com>

Subject: RE: In Re: PersonalWeb Technologies, LLC

Jeff,

Please let me know what PersonalWeb currently plans to do, if anything, to secure the judgment. Amazon is not willing to leave the judgment unsecured during the appeal. I think it is in the interest of both sides to avoid incurring additional expenses around this issue, and Amazon reserves the right to seek reimbursement of any such expense that PersonalWeb forces it to incur by failing to secure the judgment. But it would be much simpler if PersonalWeb posted a bond voluntarily.

Finally, for the purposes of meeting and conferring regarding this issue and related potential motion practice, please let me know: (1) whether PersonalWeb currently has sufficient funds to pay the judgment in full; and (2) if not, what assets and what amount of cash does PersonalWeb have available to it to secure the judgment?

Thank you,

Todd Gregorian

Fenwick | Partner | 415-875-2402 | tgregorian@fenwick.com

From: Jeffrey Gersh <jgersh@stubbsalderton.com>
Sent: Monday, April 5, 2021 3:48 PM
To: Todd Gregorian <TGregorian@fenwick.com>; Michael Sherman <masherman@stubbsalderton.com>
Cc: Viviana Boero Hedrick <vhedrick@stubbsalderton.com>; David Hadden <DHadden@fenwick.com>
Subject: RE: In Re: PersonalWeb Technologies, LLC

Todd

Sorry for any delay in responding to your question. At this time the client is considering its options and no decision one way or the other has been made. Please feel free to follow-up with me at the end of the week or early next week.

Regards

JG

Jeffrey F. Gersh

Partner, Stubbs Alderton & Markiles, LLP

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From: Todd Gregorian <TGregorian@fenwick.com>
Sent: Monday, April 5, 2021 11:02 AM
To: Michael Sherman <masherman@stubbsalderton.com>; Jeffrey Gersh <jgersh@stubbsalderton.com>
Cc: Viviana Boero Hedrick <vhedrick@stubbsalderton.com>; David Hadden <DHadden@fenwick.com>
Subject: RE: In Re: PersonalWeb Technologies, LLC

Just following up on the below. Could you let me know your client's plan, so that Amazon does not incur any unnecessary enforcement expense?

-t

From: Todd Gregorian
Sent: Wednesday, March 31, 2021 10:23 AM
To: Michael Sherman <masherman@stubbsalderton.com>; Jeffrey Gersh <jgersh@stubbsalderton.com>
Cc: Viviana Boero Hedrick <vhedrick@stubbsalderton.com>; David Hadden <DHadden@fenwick.com>
Subject: In Re: PersonalWeb Technologies, LLC

Counsel,

I saw that PersonalWeb intends to appeal the fee order. Does it intend to post a bond to extend the automatic stay of enforcement? By when will it post?

Thanks,

-t

From: FCFdocuments@pacernpro.com <FCFdocuments@pacernpro.com>

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