

EXHIBIT 7

From: [Todd Gregorian](#)
To: [Bruce D. Poltrock](#)
Cc: [Michael Fletcher](#); [Christopher Lavin](#); [Craig A. Welin](#)
Subject: Re: Meet and Confer Demand PERSONAL WEB TECHNOLOGIES, LLC ET AL., PATENT LITIGATION
Date: Thursday, March 3, 2022 3:38:41 PM

Bruce,

All we are trying to do is set up a discovery conference and get the confirmation I requested below. Each time you threaten contempt proceedings baselessly, it creates pressure to keep the written record clear.

I assume you are offering Tuesday March 8 at 10 am? (March 3 is today.). Please confirm, and Chris will send an invite. Please be prepared to discuss the creditors' participation in PersonalWeb's activities in federal court, if any, whether through Stubbs Alderton, the receiver, or otherwise.

Thank you,
-t

On Mar 3, 2022, at 3:29 PM, Bruce D. Poltrock <bpoltrock@frandzel.com> wrote:

**** EXTERNAL EMAIL ****

Todd: no purpose for you seeking to devolve this into a needless email spat. Suffice it to say, we will address your inaccurate contentions, assertions, characterizations and the like at the appropriate time. In the meantime, let's get a meet and confer call setup so we can have a meaningful, not pretextual, conversation about the objections from the secured creditors. Again, this whole contemptuous process you are engaged in is violative of the receivership injunction, and needs to be rethought on your end. Let us know if we can speak Tuesday 3/3 @ 10:00 a.m.

Bruce D. Poltrock
FRANDZEL ROBINS BLOOM & CSATO, L.C.
1000 Wilshire Boulevard, 19th Floor
Los Angeles, CA 90017-2427
Phone: (323) 852-1000
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From: Todd Gregorian <TGregorian@fenwick.com>

Sent: Thursday, March 3, 2022 11:31 AM

To: Michael Fletcher <mfletcher@frandzel.com>

Cc: Christopher Lavin <CLavin@fenwick.com>; Bruce D. Poltrock <bpoltrock@frandzel.com>; Craig A. Welin <cwelin@frandzel.com>

Subject: [EXTERNAL] RE: Meet and Confer Demand PERSONAL WEB TECHNOLOGIES, LLC ET AL., PATENT LITIGATION

Michael,

You say our request for a conference is unreasonable, yet in your next paragraph you confirm that the subpoena recipients will refuse to comply. The discovery dispute is thus ripe, and we intend to move promptly without delay. Please enjoy your vacation and we will conduct the conference with your colleagues. Bruce and Craig, please let us know your availability to confer today, tomorrow, or Monday on the objections. To facilitate the conference, please also confirm whether the Insiders or any of their principals have been included on communications with Stubbs Alderton concerning PersonalWeb's federal court litigations.

Finally, the receiver, PersonalWeb's litigation counsel, and the Insiders, have each on multiple occasions threatened contempt sanctions against Amazon, so let me address that issue directly. Amazon has the utmost respect for the authority of the Superior Court. But these threats are meritless---an attempt to misuse the Court's authority to protect the Insiders' financial interests. Since we have received these threats over the course of more than five months, I suspect you are already well aware that Amazon has not violated the Superior Court's order. The current subpoenas seek valid post-judgment discovery from the Insiders. They do not implicate the receivership or any assets of PersonalWeb; they simply require your clients to turn over records.

Thank you,

Todd Gregorian

Fenwick | Partner | +1 415-875-2402 | tgregorian@fenwick.com | Admitted to practice in California.

From: Michael Fletcher <mfletcher@frandzel.com>

Sent: Thursday, March 3, 2022 11:16 AM

To: Todd Gregorian <TGregorian@fenwick.com>

Cc: Christopher Lavin <CLavin@fenwick.com>; Bruce D. Poltrock <bpoltrock@frandzel.com>; Craig A. Welin <cwelin@frandzel.com>

Subject: Meet and Confer Demand PERSONAL WEB TECHNOLOGIES, LLC ET AL., PATENT LITIGATION

**** EXTERNAL EMAIL ****

Todd and Chris: I have your email demanding a meet and confer, more or less immediately, about your “motion to compel.” I am pretty sure that the purpose of a meet and confer in the third party discovery context would be to have a meaningful discussion of the objections raised to your subpoenas to 3 of the secured creditors. You seem to have prejudged the outcome of that meet and confer, perhaps because you didn’t actually read any of the objections. I note that my office emailed the objections to you at 5:02 pm (Pacific time) yesterday but that you sent your demand to meet and confer about your “motion to compel” at 5:16 pm. That hardly bespeaks of you even reading the objections much less than considering them. Hopefully this isn’t all just a pretext by you, a meaningless “check the box” exercise where you have no real interest in having a real, substantive discussion.

Had you taken the time to read the objections, you would have seen that the secured creditors consider the service of the subpoenas by you and by your clients to be a contempt, 3 actually, as you decided to serve 3 subpoenas, each one of which violates the receivership injunction. They are continuing contempts, as is this entire process. While contempt is a serious matter, this is hardly an emergency situation requiring a discussion — hopefully a meaningful one as noted above — in the time frame you have demanded.

I have no time today (Thursday) to discuss any of this with you, as today is my last day in the “home office.” I am on vacation starting in a few hours for the next 2+ weeks. I return on Monday, March 21. I have been out much of the morning today and am fully tied up the rest of the afternoon on other matters. I am happy to block out time to discuss this with you at virtually any time during the week of March 21.

How about 10 am on Monday, March 21, with both of you and my colleague Bruce Poltrock? If that works for you, we will set up a Zoom call.

Or, if you insist on treating this non-emergency as a faux emergency, you can reach out to my colleagues Bruce Poltrock and Craig Welin (who are copied on this email --- please copy them on all emails in the case) to schedule a time that works for their schedules to start to have a meaningful, not pretextual, conversation about the objections from the secured creditors. There are real options here — options that don’t involve contemptuous behavior by you and your clients.

Michael Fletcher

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From: Todd Gregorian <TGregorian@fenwick.com>
Sent: Wednesday, March 2, 2022 5:16 PM
To: Michael Fletcher <mfletcher@frandzel.com>
Cc: Christopher Lavin <CLavin@fenwick.com>
Subject: [EXTERNAL] FW: IN PERSONAL WEB TECHNOLOGIES, LLC ET AL., PATENT LITIGATION

Michael,

Please let us know your availability tomorrow or Friday to meet and confer on a motion to compel further responses and production.

Todd Gregorian
[Fenwick](#) | Partner | +1 415-875-2402 | tgregorian@fenwick.com | Admitted to practice in California.

From: Barbara Wilson <bwilson@frandzel.com>
Sent: Wednesday, March 2, 2022 5:02 PM
To: David Hadden <DHadden@fenwick.com>; Saina Shamilov <sshamilov@fenwick.com>; Melanie Mayer <mmayer@fenwick.com>; Todd Gregorian <TGregorian@fenwick.com>; Ravi Ranganath <rranganath@fenwick.com>; lhadley@glaserweil.com; masherman@stubbsalderton.com; jgersh@stubbsalderton.com; wmonroe@stubbsalderton.com
Subject: IN PERSONAL WEB TECHNOLOGIES, LLC ET AL., PATENT LITIGATION

**** EXTERNAL EMAIL ****

TO: J. DAVID HADDEN, SAINA S. SHAMILOV, MELANIE L. MAYER, TODD R. GREGORIAN, RAVI R. RANGANATH (FENWICK & WEST LLP Silicon Valley Center)
LAWRENCE M. HADLEY (GLASER WEIL FINK HOWARD AVCHEN & SHAPIRO LLP)
MICHAEL A. SHERMAN, JEFFREY F. GERSH, WESLEY W. MONROE (STUBBS ALDERTON MARKILES, LLP)

Attached please e-mail services copies of the following: **OBJECTIONS OF THIRD PARTIES 1) BRILLIANT DIGITAL ENTERTAINMENT, INC., 2) CLARIA INNOVATIONS, LLC, AND 3) EUROPLAY CAPITAL ADVISORS, LLC TO SUBPOENAS TO PRODUCE DOCUMENTS ISSUED BY AMAZON.COM, INC., AMAZON WEB SERVICES, INC., AND TWITCH INTERACTIVE, INC.**, hard copies will follow via FedEx. If you have any questions, please contact Michael Fletcher. Thank you.

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