

Chelsea Echeverria

From: Elsa De Lima
Sent: Thursday, April 6, 2023 5:28 PM
To: Barsanti, Vanessa; C. David Durkee, Esq.
Cc: *FMcDonald [REDACTED] slong [REDACTED] Jakola, Katie; Devin Reid; Discovery Email
Subject: RE: BP/B3 - Violation of Protective Order
Attachments: BP Response Withdrawing Confidential Designation.pdf; 3-19CV00963_DocketEntry_11-29-2022_565-3 - Filed Publication Tracker.pdf

Dear Vanessa,

Thank you for taking an interest in the Downs Law Group's website. Please see attached BP's Response withdrawing the confidential designation for the publication tracker, as well as the filed, court-stamped version of the publication. Below is the docket entry where Judge Cannon directed the clerk to unseal Exhibit 3 to our response to the Motion to Strike Gina Solomon. Exhibit 3 was the publication tracker.

572	12/19/2022	ORDER re 569 Response to Motion. The clerk is directed to unseal Exhibits 3, 4(b), and 4(d) to Plaintiff MAGISTRATE JUDGE HOPE T CANNON on 12/19/2022. (alb) (Entered: 12/19/2022)
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If you have any questions about the contents of the "BP Papers" or otherwise, please do not hesitate to let us know.

Thank you,

ELSA DE LIMA
ATTORNEY



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From: Barsanti, Vanessa <vanessa.barsanti@[REDACTED]>
Sent: Wednesday, April 5, 2023 6:36 PM
To: David Durkee, Esq. <[REDACTED]@downslawgroup.com>; Elsa De Lima <[REDACTED]@downslawgroup.com>; [REDACTED]@downslawgroup.com
Cc: *FMcDonald [REDACTED] FMcDonald [REDACTED]; slong [REDACTED] Jakola, Katie <kjakola@[REDACTED]>
Subject: BP/B3 - Violation of Protective Order

Counsel,

It has come to my attention that your firm has published on its website a Confidential BP document produced in the *Frasseti* matter, in violation of the September 29, 2021 Order Governing Confidential Materials and Discovery of Electronically Stored Information (No. 3:21-cv-00549; ECF No. 47) (the "Protective Order"). The Protective Order is attached for your convenience. As is clearly indicated on the slipsheet for this spreadsheet, bates numbered BP-B3_DLG_00149371, this document is to be treated as Confidential under the Protective Order. Please remove it from your website immediately, and please advise whether you have shared this document in any other manner with any individual other than those permitted in paragraphs 4(a)(i)-(xi) of the Protective Order.

If the document is not removed by close of business tomorrow, April 6, we will seek relief from the Court.

Vanessa Barsanti

She/Her/Hers

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