



T Kost &lt;tkost999@gmail.com&gt;

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**Issues**

2 messages

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**Paul Dulberg** <Paul\_Dulberg@comcast.net>  
To: Tom Kost <tkost999@gmail.com>

Mon, Jan 10, 2022 at 5:42 PM

During our phone conversation you mentioned waiting till the February 3rd status hearing before submitting any more RFA's (Request for admittance) because the Judge said;

"I'm not granting leave for depositions. I'm not granting leave for anything else, just those specific discovery requests."

My fear here is that we attend the February 3rd status hearing and the Judge closes F1 discovery completely.

From our conversation my understanding is as of now we have only 1 document out of nearly 10,000 that we can use at trial.

This is not enough to go to trial with.

For this reason we need to ask the court to reconsider the last court order and allow us to submit documents for RFA's.

Also, we should ask for leave to amend the complaint based on what we discovered during the discovery process.

In all honesty, I would forfeit the 10 interrogatories and the 10 production requests in order to get the documents submitted as RFA's

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**T Kost** <tkost999@gmail.com>  
To: Paul Dulberg <Paul\_Dulberg@comcast.net>


Tue, Jan 11, 2022 at 1:28 AM

2 things in attached notepad draft:

- 1) Note to Alphonse on this issue
- 2) Draft for a motion to reconsider

[Quoted text hidden]

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 **alphonse\_motion\_draft.txt**  
10K