From: Joseph J. Zito
To: Victoria Webb; William Ramey; Kimberly S. Devine; Tina Hueske; LitigationParalegals; Kyril Talanov
Cc: Joseph Berghammer; Janice Mitrius; Joe McCollum; litigation@whitestone.law
Subject: Re: Ice Rover v. YETI - YETI"s Initial Disclosures and First Set of Discovery Requests
Date: Wednesday, September 13, 2023 7:04:05 PM
Attachments: Rover Rule 26(a) Initial Disclosures to Yeti.pdf

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Ms. Webb:

Thank you for your e-mail of today.

Attached is Ice Rover's Initial Disclosures.

Please include me on all correspondence going forward.

Can you please resend the attachments listed in your e-mail of September 5 below?

Joseph J. Zito
Whitestone Law
jzito@whitestone.law
202-466-3500

On 9/13/2023 6:14 PM, Victoria Webb wrote:

> Mr. Ramey,
>
> As you know, the Court entered the parties' Agreed Scheduling Order (ECF 33) and required the parties to serve their respective Initial Disclosures by September 5, 2023. YETI served its Initial Disclosures on Ice Rover in accordance with the Court-ordered deadline. But Ice Rover did not. Instead, in your below email, you attempted to unilaterally extend Ice Rover's due date to September 12, 2023 without agreement of YETI or Court Order. But Ice Rover failed to serve its Initial Disclosures by yesterday, September 12, 2023, and is now over a week past the Court-ordered deadline. Please immediately serve Ice Rover's Initial Disclosures. If Ice Rover refuses to immediately comply with the Court-ordered deadline, YETI reserves all rights, including seeking sanctions and fees.
>
> In addition, we have copied Mr. Joseph J. Zito from Whitestone Law on this email in view of him filing an appearance yesterday as counsel for Ice Rover. Please let us know if going forward we should continue to include both you and Mr. Zito on all correspondence and communications regarding this case.
>
> Regards,
> Vicki
>
> **VICTORIA WEBB | ATTORNEY**
>
> **BANNER WITCOFF**
> TEL: 312.463.5478 | MAIN: 312.463.5000
> bannerwitcoff.com | vwebb@bannerwitcoff.com

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From: Victoria Webb
Sent: Tuesday, September 5, 2023 5:43 PM
To: 'William Ramey' <wramey@rameyfirm.com>; Kimberly S. Devine <kdevine@bannerwitcoff.com>; Tina Hueske <thueske@rameyfirm.com>; LitigationParalegals <LitParalegals@rameyfirm.com>; Kyril Talanov <ktalanov@rameyfirm.com>
Cc: Joseph Berghammer <jberghammer@bannerwitcoff.com>; Janice Mitrius <jmitrius@bannerwitcoff.com>; Joe McCollum <jmccollum@bannerwitcoff.com>
Subject: RE: Ice Rover v. YETI - YETI's Initial Disclosures and First Set of Discovery Requests

Mr. Ramey – The scheduling order in this case (ECF 33) sets today as the "deadline to serve Initial Disclosures." If Ice Rover chooses to ignore the Court's order, YETI reserves all rights.

Regards,
Vicki

VICTORIA WEBB | ATTORNEY

BANNER WITCOFF
TEL: 312.463.5478 | MAIN: 312.463.5000
bannerwitcoff.com | vwebb@bannerwitcoff.com

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From: William Ramey <wramey@rameyfirm.com>
Sent: Tuesday, September 5, 2023 5:21 PM
To: Kimberly S. Devine <KDevine@bannerwitcoff.com>; Tina Hueske <thueske@rameyfirm.com>; LitigationParalegals <LitParalegals@rameyfirm.com>; Kyril Talanov <ktalanov@rameyfirm.com>
Cc: Joseph Berghammer <JBerghammer@bannerwitcoff.com>; Janice Mitrius <JMitrius@bannerwitcoff.com>; Victoria Webb <VWebb@bannerwitcoff.com>
Subject: RE: Ice Rover v. YETI - YETI's Initial Disclosures and First Set of Discovery Requests

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We are going to serve ours on the 12th, the day after the Markman.

Thanks,

Bill

From: Kimberly S. Devine <KDevine@bannerwitcoff.com>
Sent: Tuesday, September 5, 2023 5:14 PM
To: William Ramey <wramey@rameyfirm.com>; Tina Hueske <thueske@rameyfirm.com>; LitigationParalegals <LitParalegals@rameyfirm.com>; Kyril Talanov <ktalanov@rameyfirm.com>
Cc: Joseph Berghammer <JBerghammer@bannerwitcoff.com>; Janice Mitrius <JMitrius@bannerwitcoff.com>; Victoria Webb <VWebb@bannerwitcoff.com>
Subject: Ice Rover v. YETI - YETI's Initial Disclosures and First Set of Discovery Requests

Mr. Ramey,

Please find attached for service:

1. YETI's Rule 26(a)(1)(A) Initial Disclosures
2. YETI's First Set of Interrogatories to Ice Rover (Nos. 1-9)
3. YETI's First Set of Requests for Production to Ice Rover (Nos. 1-13)

Regards,
Kim

KIMBERLY S. DEVINE | ATTORNEY

BANNER WITCOFF
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Chicago, IL 60606

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