

1 It was the first time the defendants had ever
2 attempted to get documents in a year-
3 and-a-half. So we filed a motion for
4 protective order because it wasn't timely. And
5 Your Honor subsequently extended the discovery
6 cutoff.

7 We have never had a problem showing
8 Proskauer's file to the former clients because
9 under the law, they have a right to look at it.
10 The file takes up an entire conference room
11 table. It was corporate work that was
12 performed over a course of several years.

13 However, if they had just asked to come
14 and look at the file, I would have said, yeah;
15 come look at it next week.

16 But what they did was the corporate
17 representative of the defendants on his home
18 computer typed up this Request for Production.
19 It's 35 document requests of what he thinks
20 should be in our file.

21 If he had said, we'd like to come look at
22 the file, it would not have been an issue. But
23 what they did was this lay person has asked for
24 copies of the personal employment file of
25 several of Proskauer's attorneys who worked on