

**STARK REAGAN, P.C.**  
 Attorneys and Counsellors  
 1111 West Long Lake Road, Suite 202  
 P.O. Box 7037  
 Troy, MI 48007-7037  
 (248) 641-9955

OB Companies/Simply Self Storage

Kyle A. Schmutzler  
 7505 W. Sand Lake Rd  
 Orlando, FL 32819

Client Number 5858 WG  
 Invoice Number 59593  
 Invoice Date 04/12/2019  
 Activity Billed Through 03/31/2019

**Regarding: Lamar/International Outdoor**

**00011**

**Services:**

02/15/2019	CEL	Receive and review Lamar reply brief on appeal.
02/18/2019	CEL	Prepare subpoena for billing records regarding International Outdoor.
02/27/2019	CEL	Receive and review correspondence from Brighton resident regarding International Outdoor fraud allegation.
02/28/2019	CEL	Review file and prepare for hearing on motion for attorney fees.
02/28/2019	SGR	Office conferences with Christopher LeVasseur regarding evidentiary hearing; legal research on matters.
03/01/2019	CEL	Telephone conference with attorney for Lamar regarding attorney fee motion; receive, review and reply to email from same.
03/01/2019	CEL	Continue preparation for evidentiary hearing on motion for attorney fees; research regarding standards for award of fees; review and assemble exhibits for hearing.
03/01/2019	SGR	Office conferences with Christopher LeVasseur regarding attorney fee hearing; review file; conduct legal research on rules of evidence and other matters; office conference with Christopher LeVasseur regarding same.
03/04/2019	CEL	Review file and prepare for hearing on attorney fees; attend hearing.
03/04/2019	SGR	Review files; attend attorney fee hearing with Christopher LeVasseur at OCCC.

Total Services:            \$7,128.00

Disbursements:

From: Patrick Depa  
Sent: Tuesday, June 18, 2019 9:16 PM  
To: Christopher LeVasseur  
Subject: Re: Randy

*\* Bingo*

Hi Chris I was at a conference all day so I just got your emails at 6 o'clock now. Give me a call if you get this I'm on the West Coast so it's early give me a call if you need to talk I'm gonna read the affidavits now. I'll read those questions from Lamar the best Can.

Pat

Sent from my iPhone

On Jun 18, 2019, at 9:00 AM, Christopher LeVasseur <clevasseur@starkreagan.com> wrote:

Hi Patrick; did you get my email from this morning? I was hoping we could set up a conference call with Lamar's attorneys later today, after you get out of work. Will that be possible?

Christopher E. LeVasseur  
Stark Reagan, P.C.  
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Facsimile: 248-641-9921  
[clevasseur@starkreagan.com](mailto:clevasseur@starkreagan.com)  
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<image001.jpg>

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*Where IS THIS*

*Where IS THE AFFIDAVITS*





PAT DePA EMAILS  
TO CHRIS LAVASSAR

From: Patrick Depa  
Sent: Monday, May 13, 2019 6:12 PM  
To: clevasseur@starkreagan.com  
Subject: Oram

Mr. LeVasseur, not sure if you are still in a battle with mr Oram over the Auburn Hills site but if you want to talk let me know.

Pat

Sent from my iPhone

MOTION TO Re-CUSE FOR Purposes of SUPPRESSION & FAVORITISM

file complaint w/ U.S. ATTY - ATTY GEN - FBI JUDICIAL Tenure Comm.

MOTION  
1) Include CHRIS LAVASSAR AS PART OF THIS LAWSUIT  
2) Remove him FROM CASE

GET COPIES OF FULL DISCOVERY  
- ALL DOCS  
- ALL TEXTS & ALL ATTACHMENTS  
- ALL CELL PHONES & ALL RECORDS  
- ALL RECORDING ALL CALLS  
- WHAT INFO/DETAILS DID HE SHARE w/ LAMAN LAWYERS RE: PAT

MOTION TO ReCUSE JUDGE BASIS OF BIAS, UPON INFO & BELIEF PARTNER GRECO & ANDERSON ARE BEST FRIENDS. P. - previous firm was newman ANDERSON - go over details OF JUDGE creating harm TO SUPPRESS MY CASE & NOT USING STANDARDS & BURDEN TO SET ASIDE. - go over details PARTNERSHIP. GRECO LOBBYED FOR ANDERSON w/ VIVIANO BARR PRES.

**From:** Patrick Depa  
**Sent:** Tuesday, June 18, 2019 9:16 PM  
**To:** Christopher LeVasseur  
**Subject:** Re: Randy

*\* BINGO*

Hi Chris I was at a conference all day so I just got your emails at 6 o'clock now. Give me a call if you get this I'm on the West Coast so it's early give me a call if you need to talk I'm gonna read the affidavits now. I'll read those questions from Lamar the best Can.

Pat

Sent from my iPhone

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Hi Patrick; did you get my email from this morning? I was hoping we could set up a conference call with Lamar's attorneys later today, after you get out of work. Will that be possible?

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<image001.jpg>

*WHERE IS THIS*

*WHERE IS THE AFFIDAVITS*

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**From:** Patrick Depa  
**Sent:** Tuesday, June 18, 2019 11:50 PM  
**To:** Christopher LeVasseur  
**Subject:** Re: Randy's Response to Lamar Motion

Jeff's affidavits:

*when?*

4) my contract was not renewed because I told Randy I was leaving. And a contract, in the lamest sense of the word, was not needed.

5). Under number five this is a lie. He did not know of multiple meetings with Alan Randy and I about proceeding or suing Auburn Hills when we thought the lease was active. He knew I was involved when we both were told to look at/in every paper and electronica file to find a renewal letter that Alan supposedly wrote. When actually Alan never wrote one.

*I wrote letter in my testimony*

Project goals were a big picture not day-to-day issues Randy knew that I knew that Jeff knew that.

7) I told Jeff straight up Randy created that letter. When I told Jeff that Jeff covered his ears while laughing saying I hear that. Then I told him many more times, more than a dozen times.

He definitely got the assertion from me that the letter wasn't authentic. Deep down he knew it to because if he did he would've told me to confront Randy but we just laughed it off even though I was steaming.

9) I'm sorry we did meet with Auburn Hills about if we had a property to present an application with what would they want, it wasn't especially about simply storage as it was if we found another property too.

They, Auburn Hills said they weren't sure if they wanted any more billboards and that they didn't know what they wanted but that they would recommend denial if it came before planning commission at this time.

I believe we put our application into MDOT but the landowner acknowledgment expired so it went nowhere.

11) I prepared at least three PUD packets for different sites including simply storages PUD package. The issue was say it would take 60-70 hours is nothing but BS, because all I did was cut and paste the same language from the Lamar and Adams packages. If you look at the packages they are identical to the ones they put together, nothing new except our mock ups which took me 10 minutes to do. I just would mark them up and give them to our creative person in house. I pulled those packages off of the Auburn hills PC and CC agendas. They were attachments.

They are lying so much it's pathetic. I looked at the answers that Randy gave in his original deposition and even though you may not have asked all the right questions his lies are all over that. I am extremely sorry you guys had to go through this.

Let me know you got this. Call me 8:00 am my time to talk.

Patrick

Sent from my iPhone

On Jun 18, 2019, at 5:12 AM, Christopher LeVasseur <[clevasseur@starkreagan.com](mailto:clevasseur@starkreagan.com)> wrote:

*How?  
When did he get these?  
He was never privileged about them*

*How would he have*

*side must be same*

**From:** Christopher LeVasseur  
**Sent:** Friday, June 07, 2019 7:55 AM  
**To:** 'Patrick Depa'  
**Subject:** RE: Oram  
**Attachments:** Lamar and SS's Motion for Relief from Judgment.pdf

fyi

Christopher E. LeVasseur  
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**From:** Patrick Depa [<mailto:patrickdepa@yahoo.com>]  
**Sent:** Thursday, June 06, 2019 7:34 PM  
**To:** Christopher LeVasseur  
**Subject:** Re: Oram

OK, thank you for the heads up.

Sent from my iPhone

On Jun 6, 2019, at 12:54 PM, Christopher LeVasseur <[clevasseur@starkreagan.com](mailto:clevasseur@starkreagan.com)> wrote:

Hi Patrick; just wanted to give you a heads up that the motion is being filed today. If you can, let me know if anybody tries to contact you, and especially if you get any threats about your affidavit. Hopefully that

won't happen, but I imagine Randy is not going to be happy that the truth is coming out.

Christopher E. LeVasseur

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<image001.jpg>

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**STATE OF MICHIGAN  
IN THE CIRCUIT COURT FOR OAKLAND COUNTY  
IN THE BUSINESS COURT**

INTERNATIONAL OUTDOOR, INC.,

Plaintiff,

Case No. 2016-155472-CB  
Hon. Martha Anderson

v.

SS MITX, LLC and LAMAR ADVERTISING OF  
MICHIGAN, INC,

Defendants

and

LAMAR ADVERTISING OF MICHIGAN, INC.,  
d/b/a THE LAMAR COMPANIES and  
SS MITX, LLC, d/b/a SIMPLY SELF STORAGE,

Plaintiffs

Case No. 2016-155489-CB  
Hon. Martha Anderson

v.

INTERNATIONAL OUTDOOR, INC.,

Defendant.

---

ALTIOR LAW, P.C.  
Kenneth F. Neuman (P39429)  
Stephen T. McKenney (P65673)  
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[kneuman@altiorlaw.com](mailto:kneuman@altiorlaw.com)  
[smckenney@altiorlaw.com](mailto:smckenney@altiorlaw.com)  
Attorney for Lamar Advertising

---

POTTER DEAGASTINO O'DEA &  
PATTERSON  
Steven M. Potter (P33344)  
Rick J. Patterson (P55706)  
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[rjpatterson@potterlaw.com](mailto:rjpatterson@potterlaw.com)  
Attorneys for International Outdoor

---

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[clevasseur@starkreagan.com](mailto:clevasseur@starkreagan.com)  
Attorney for Simply Self Storage

---

**From:** Christopher LeVasseur  
**Sent:** Friday, June 07, 2019 1:46 PM  
**To:** 'Patrick Depa'  
**Subject:** RE: Oram

No problem, we'd be able to work around your schedule. I can't say it enough, thanks again.

Christopher E. LeVasseur  
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**From:** Patrick Depa [mailto:patrickdepa@yahoo.com]  
**Sent:** Friday, June 07, 2019 1:45 PM  
**To:** Christopher LeVasseur  
**Subject:** Re: Oram

*WHAT WAS THAT WAS HARSH HE ZEND*

Wow that is pretty harsh but it's the truth. I really wish this never had to happen but I'm at peace with it. I couldn't live with myself knowing he got away with such a scam and to such a large amount. If this does have to go beyond this we would need to talk because I have plans this summer and certain dates I don't want to miss.

Pat

Sent from my iPhone

On Jun 7, 2019, at 4:54 AM, Christopher LeVasseur <[clevasseur@starkreagan.com](mailto:clevasseur@starkreagan.com)> wrote:

fyi ← FYI TO WHAT? There IS MISSING DETAILS HERE

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<image001.jpg>

READ PAT'S COMMENTS  
WHAT WAS INCLUDED  
THAT HE READ.

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**Sent:** Thursday, June 06, 2019 7:34 PM  
**To:** Christopher LeVasseur  
**Subject:** Re: Oram

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Sent from my iPhone

On Jun 6, 2019, at 12:54 PM, Christopher LeVasseur <[clevasseur@starkreagan.com](mailto:clevasseur@starkreagan.com)> wrote:

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<Lamar and SS's Motion for Relief from Judgment.pdf>

↑  
Did not provide

PA

**From:** Christopher LeVasseur  
**Sent:** Tuesday, June 18, 2019 8:12 AM  
**To:** 'Patrick Depa'  
**Subject:** Randy's Response to Lamar Motion  
**Attachments:** Resp to Mtn for Relief from Judgment efile 6.17.19.pdf

Hi Pat; see attached response filed by Randy's attorneys. If you have a chance today, can you review and give me your thoughts? The hearing is tomorrow morning.

Lamar's attorneys are specifically interested in the following questions:

Chris:

If you have the chance can you reach out to Pat Depa to send him the response and gauge his reaction. I am most interested in the Faycurry piece. Can he explain the timing issue?

What does he have to say about the 2016 project notes?

What was his role in getting the billboard approved in 2018 (and is that why he left)?

Also, anything else that jumps out at him from Randy and Jeff's affidavits.

*How voice mail?*

*WHAT WAS PAT'S RESPONSE*

- NO EMAIL
- NO RECORD OF PHONE CALL
- NO TEXT

*↑  
WHAT ELSE DID PAT TELL CHRIS?  
When? How?*

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STATE OF MICHIGAN  
OAKLAND COUNTY CIRCUIT COURT

INTERNATIONAL OUTDOOR, INC.,  
a Michigan corporation,

Plaintiff,

vs

Case No. 2016-155472-CB  
Hon. Martha D. Anderson

SS MITX, LLC, a Delaware limited liability  
company, and LAMAR ADVERTISING OF  
MICHIGAN, INC., a Michigan corporation,

Defendants,

and

LAMAR ADVERTISING OF MICHIGAN, INC.  
d/b/a THE LAMAR COMPANIES and  
SS MITX, LLC d/b/a SIMPLY SELF STORAGE,

Plaintiffs,

vs

Case No. 16-155489-CB  
Hon. Martha D. Anderson

INTERNATIONAL OUTDOOR, INC.,

Defendant.

---

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RICK J. PATTERSON (P55706)  
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---

**INTERNATIONAL OUTDOOR, INC.'S RESPONSE TO DEFENDANTS'  
MOTION FOR RELIEF FROM JUDGMENT**

**From:** Christopher LeVasseur  
**Sent:** Tuesday, June 18, 2019 12:01 PM  
**To:** 'Patrick Depa'  
**Subject:** Randy

Hi Patrick; did you get my email from this morning? I was hoping we could set up a conference call with Lamar's attorneys later today, after you get out of work. Will that be possible?

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[www.starkreagan.com](http://www.starkreagan.com)

↑  
DID THIS  
TAKE PLACE -?  
WHAT WAS DISCUSSED  
THIS WAS ALL  
STAGED & PLANTED

## STARK REAGAN

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**From:** Christopher LeVasseur  
**Sent:** Wednesday, June 19, 2019 10:06 AM  
**To:** 'Patrick Depa'  
**Subject:** Lamar Motion

We won! She's going to hold an evidentiary hearing to decide whether she believes you, and if she does, I expect that she'll set aside the verdict.

I can't thank you enough for coming forward; it looks like the truth is going to prevail after all. I'll be in touch soon with the next step in the process.

Christopher E. LeVasseur  
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[clevasseur@starkreagan.com](mailto:clevasseur@starkreagan.com)  
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He MUST HAVE KNOWN SHE (THE JUDGE) WAS GOING TO SET ASIDE THE VERDICT - SHE COULD NOT HAVE BELIEVED HIM - & HE DIDN'T HAVE COMPUTER REPORT OR TESTIMONY - SO HOW DID HE EXPECT AS SUCH?

**STARK REAGAN**

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---

**From:** Christopher LeVasseur  
**Sent:** Wednesday, July 17, 2019 10:02 AM  
**To:** 'Patrick Depa'  
**Subject:** International Outdoor

Good morning Patrick; can you give me a call when you have a chance? I want to give you a status update; either office (248-641-9955) or cell (248-310-6931) is fine.

Christopher E. LeVasseur  
**Stark Reagan, P.C.**  
1111 W. Long Lake Road  
Troy, Michigan 48098  
Telephone: 248-641-9955  
Facsimile: 248-641-9921  
[clevasseur@starkreagan.com](mailto:clevasseur@starkreagan.com)  
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## STARK REAGAN

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**From:** Christopher LeVasseur  
**Sent:** Monday, July 22, 2019 8:05 AM  
**To:** 'Patrick Depa'  
**Subject:** RE: International Outdoor

That's obviously disturbing. I'll be in the office all day, call me any time.

Christopher E. LeVasseur  
**Stark Reagan, P.C.**  
1111 W. Long Lake Road  
Troy, Michigan 48098  
Telephone: 248-641-9955  
Facsimile: 248-641-9921  
[clevasseur@starkreagan.com](mailto:clevasseur@starkreagan.com)  
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## STARK REAGAN

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**From:** Patrick Depa [mailto:patrickdepa@yahoo.com]  
**Sent:** Sunday, July 21, 2019 5:33 PM  
**To:** Christopher LeVasseur  
**Subject:** Re: International Outdoor

FIND OUT DAY  
IN COURT THAT SUPPOSED  
DIVERSION FROM DISCOVERY REQUEST  
W/ MOTION - "WITNESS INTIMIDATION"  
SEE TRANSCRIPT.

Hi Chris,

So you were right, the threats are coming I received to phone calls from a person I used to work with, Steve Shea, a friend of Randy's.

The first phone call came a couple of days ago where Steve said I should recant what I wrote in my affidavit because Randy and his lawyers are going to sue me until I am broke, get personal with me and my past, call my mother and kids by subpoena and wreak all future job opportunities. Also, he said they will come into my employment and interview my bosses too.

Then just now he called me and said he just went to church and said that sin is punishable by death. That I should just write him an affidavit recanting all of what I said so he could get it to Randy. He said "Patrick just end all of this nonsense before this ends in blood shed". I said "I hope it doesn't lead to blood shed" and Steve said "But you just don't know".

I have to say I do get a little nervous when I go out at night. Let's touch base either tomorrow or Tuesday. I might have some time tomorrow morning but my afternoon and evening, with a night meeting, is packed.

Pat

On Jul 17, 2019, at 7:01 AM, Christopher LeVasseur <[clevasseur@starkreagan.com](mailto:clevasseur@starkreagan.com)> wrote:

Good morning Patrick; can you give me a call when you have a chance? I want to give you a status update; either office (248-641-9955) or cell (248-310-6931) is fine.

Christopher E. LeVasseur  
**Stark Reagan, P.C.**  
1111 W. Long Lake Road  
Troy, Michigan 48098  
Telephone: 248-641-9955  
Facsimile: 248-641-9921  
[clevasseur@starkreagan.com](mailto:clevasseur@starkreagan.com)  
[www.starkreagan.com](http://www.starkreagan.com)  
<image001.jpg>

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**From:**  
**Sent:**  
**To:**  
**Subject:**

Christopher LeVasseur  
Wednesday, July 31, 2019 1:18 PM  
'Patrick Depa'  
RE: Any updates

Just texted you

*Never provided  
A COPY OF TEXTS*

Christopher E. LeVasseur  
Stark Reagan, P.C.  
1111 W. Long Lake Road  
Troy, Michigan 48098  
Telephone: 248-641-9955  
Facsimile: 248-641-9921  
[clevasseur@starkreagan.com](mailto:clevasseur@starkreagan.com)  
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-----Original Message-----

From: Patrick Depa [<mailto:patrickdepa@yahoo.com>]

Sent: Wednesday, July 31, 2019 1:10 PM

To: Christopher LeVasseur CELL

Subject: Any updates

Any updates on the computer

— why was he  
so concerned?  
w/ computer.

Sent from my iPhone

---

**From:** Christopher LeVasseur  
**Sent:** Thursday, August 01, 2019 11:55 AM  
**To:** 'Patrick Depa'  
**Subject:** RE: Any updates

The new attorney is now indicating that he does want to take your deposition; are you available 8/17? He hasn't told me yet whether he plans to fly out to do it in person or by Skype/video.

Christopher E. LeVasseur  
Stark Reagan, P.C.  
1111 W. Long Lake Road  
Troy, Michigan 48098  
Telephone: 248-641-9955  
Facsimile: 248-641-9921  
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-----Original Message-----

From: Patrick Depa [<mailto:patrickdepa@yahoo.com>]

Sent: Wednesday, July 31, 2019 1:10 PM

To: Christopher LeVasseur CELL

Subject: Any updates

Any updates on the computer

Sent from my iPhone

---

**From:** Christopher LeVasseur  
**Sent:** Thursday, August 01, 2019 12:25 PM  
**To:** 'Patrick Depa'  
**Subject:** RE: Any updates

Great, plan on it and I'll be in touch with further details.

Christopher E. LeVasseur  
Stark Reagan, P.C.  
1111 W. Long Lake Road  
Troy, Michigan 48098  
Telephone: 248-641-9955  
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-----Original Message-----

From: Patrick Depa [<mailto:patrickdepa@yahoo.com>]

Sent: Thursday, August 01, 2019 12:24 PM

To: Christopher LeVasseur

Subject: Re: Any updates

I can do the 17th

Sent from my iPhone

> On Aug 1, 2019, at 8:54 AM, Christopher LeVasseur

<[clevasseur@starkreagan.com](mailto:clevasseur@starkreagan.com)> wrote:

>

> The new attorney is now indicating that he does want to take your  
> deposition; are you available 8/17? He hasn't told me yet whether he  
> plans to fly out to do it in person or by Skype/video.

>

> Christopher E. LeVasseur

> Stark Reagan, P.C.

> 1111 W. Long Lake Road

> Troy, Michigan 48098

> Telephone: 248-641-9955

> Facsimile: 248-641-9921

> [clevasseur@starkreagan.com](mailto:clevasseur@starkreagan.com)

> [www.starkreagan.com](http://www.starkreagan.com)

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> that would define the scope and limits of the desired services.

>

>

> -----Original Message-----

> From: Patrick Depa [<mailto:patrickdepa@yahoo.com>]

> Sent: Wednesday, July 31, 2019 1:10 PM

> To: Christopher LeVasseur CELL

> Subject: Any updates

>

> Any updates on the computer

>

> Sent from my iPhone

---

**From:** Christopher LeVasseur  
**Sent:** Friday, August 02, 2019 1:07 PM  
**To:** 'Patrick Depa'  
**Subject:** RE: Any updates

Randy's attorney is flying into Portland on Saturday and will arrive around noon, so if you're still in Portland on Saturday, that might work out better for you. He would like to do it in a hotel near the airport. Let me know if that works for you.

Christopher E. LeVasseur  
Stark Reagan, P.C.  
1111 W. Long Lake Road  
Troy, Michigan 48098  
Telephone: 248-641-9955  
Facsimile: 248-641-9921  
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-----Original Message-----

From: Patrick Depa [mailto:patrickdepa@yahoo.com]  
Sent: Thursday, August 01, 2019 11:50 PM  
To: Christopher LeVasseur  
Subject: Re: Any updates

Please make it in the afternoon you can. I just remembered that I will be up in Portland that Friday. But, I can get back by noon. Thanks.

Pat

> On Aug 1, 2019, at 9:25 AM, Christopher LeVasseur  
<clevasseur@starkreagan.com> wrote:

>

> Great, plan on it and I'll be in touch with further details.

>

> Christopher E. LeVasseur  
> Stark Reagan, P.C.  
> 1111 W. Long Lake Road  
> Troy, Michigan 48098  
> Telephone: 248-641-9955  
> Facsimile: 248-641-9921  
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> -----Original Message-----

> From: Patrick Depa [mailto:patrickdepa@yahoo.com]  
> Sent: Thursday, August 01, 2019 12:24 PM  
> To: Christopher LeVasseur  
> Subject: Re: Any updates

>

> I can do the 17th

>

> Sent from my iPhone

>

>> On Aug 1, 2019, at 8:54 AM, Christopher LeVasseur

> <clevasseur@starkreagan.com> wrote:

>>

>> The new attorney is now indicating that he does want to take your  
>> deposition; are you available 8/17? He hasn't told me yet whether he  
>> plans to fly out to do it in person or by Skype/video.

>>

>> Christopher E. LeVasseur

>> Stark Reagan, P.C.

>> 1111 W. Long Lake Road

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>> scope and limits of the desired services.

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>> -----Original Message-----

>> From: Patrick Depa [mailto:patrickdepa@yahoo.com]

>> Sent: Wednesday, July 31, 2019 1:10 PM  
>> To: Christopher LeVasseur CELL  
>> Subject: Any updates  
>>  
>> Any updates on the computer  
>>  
>> Sent from my iPhone

---

**From:** Christopher LeVasseur  
**Sent:** Friday, August 02, 2019 1:35 PM  
**To:** 'Patrick Depa'  
**Subject:** RE: Any updates

Great, I'll let you know the details when I get them.

Christopher E. LeVasseur  
Stark Reagan, P.C.  
1111 W. Long Lake Road  
Troy, Michigan 48098  
Telephone: 248-641-9955  
Facsimile: 248-641-9921  
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From: Patrick Depa [mailto:patrickdepa@yahoo.com]

Sent: Friday, August 02, 2019 1:37 PM

To: Christopher LeVasseur

Subject: Re: Any updates

*He got there  
EARLY  
to meet w/ them  
for them  
to  
prep  
H.M.*

Yes, I'd be spending the night up there so I could just stick around until noon.

Pat

Sent from my iPhone

> On Aug 2, 2019, at 10:07 AM, Christopher LeVasseur

<clevasseur@starkreagan.com> wrote:

>

> Randy's attorney is flying into Portland on Saturday and will arrive  
> around noon, so if you're still in Portland on Saturday, that might  
> work out better for you. He would like to do it in a hotel near the airport.  
> Let me know if that works for you.

>

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> Please make it in the afternoon you can. I just remembered that I will  
> be up in Portland that Friday. But, I can get back by noon. Thanks.

>

> Pat

>

>> On Aug 1, 2019, at 9:25 AM, Christopher LeVasseur  
> <clevasseur@starkreagan.com> wrote:

>>

>> Great, plan on it and I'll be in touch with further details.

>>

>> Christopher E. LeVasseur  
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>> -----Original Message-----

>> From: Patrick Depa [mailto:patrickdepa@yahoo.com]

>> Sent: Thursday, August 01, 2019 12:24 PM

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>>> The new attorney is now indicating that he does want to take your

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>>> Christopher E. LeVasseur

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>>> Facsimile: 248-641-9921

>>> clevasseur@starkreagan.com

>>> www.starkreagan.com

>>>

>>>

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>>> and provide you with a detailed written analysis. Such engagement

>>> must

>> be

>>> the subject of a separate engagement letter that would define the

>>> scope and limits of the desired services.

>>>

>>>

>>> -----Original Message-----

>>> From: Patrick Depa [mailto:patrickdepa@yahoo.com]

>>> Sent: Wednesday, July 31, 2019 1:10 PM

>>> To: Christopher LeVasseur CELL

>>> Subject: Any updates

>>>

>>> Any updates on the computer

>>>

>>> Sent from my iPhone

**From:** Christopher LeVasseur  
**Sent:** Friday, August 02, 2019 2:07 PM  
**To:** 'Patrick Depa'  
**Subject:** RE: Any updates

Most definitely. Yes, the server is being cloned too, not done yet, it takes a few days because of all the info on it. I'll contact you to set up a conference call after the computer inspection is complete.

Christopher E. LeVasseur  
Stark Reagan, P.C.  
1111 W. Long Lake Road  
Troy, Michigan 48098  
Telephone: 248-641-9955  
Facsimile: 248-641-9921  
clevasseur@starkreagan.com  
www.starkreagan.com

THE PROTECTIVE ORDER  
WAS LIMITED TO  
A CERTAIN DOCUMENT  
& FOR COMPUTER GOBS  
EYES ONLY.  
NEED ALL DOCS.

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-----Original Message-----

From: Patrick Depa [mailto:patrickdepa@yahoo.com]

Sent: Friday, August 02, 2019 1:43 PM

To: Christopher LeVasseur

Subject: Re: Any updates

WHAT MADE THIS  
CURIOUS - WHAT DID  
HE KNOW OR  
UNDERSTAND THEY  
WERE GOING TO  
DO?

I assume we are going to talk before that? Curious, did they clone the server too?

Pat

↑  
DID THEY TALK?  
WHEN?  
WHAT WAS SAID?

THERE IS NO  
COMMUNICATIONS RE:  
THEM CLONING  
MY COMPUTER  
OR SERVER -  
HOW DID HE  
BECOME AWARE  
OF SUCH?

Sent from my iPhone

> On Aug 2, 2019, at 10:35 AM, Christopher LeVasseur  
<clevasseur@starkreagan.com> wrote:

>  
> Great, I'll let you know the details when I get them.

WHAT  
DETAILS DID  
HE GET &  
WHEN DID HE  
TELL HIM? / PAT?

- > Christopher E. LeVasseur
- > Stark Reagan, P.C.
- > 1111 W. Long Lake Road
- > Troy, Michigan 48098
- > Telephone: 248-641-9955
- > Facsimile: 248-641-9921
- > clevasseur@starkreagan.com
- > www.starkreagan.com

NEED TO UNDERSTAND  
WHAT TOLD CHRIS & WHEN  
PRIOR TO US KNOWING?  
WHAT DID HE KNOW?  
DID HE REVEAL  
TO PAT?

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in reliance

THIS IS  
COMPANY  
PROPRIETARY  
INFORMATION  
NEED  
CHRIS  
DEPOSITION  
& FULL  
DISCOVERY  
ON ALL  
DETAILS

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> Such engagement must be the subject of a separate engagement letter  
> that would define the scope and limits of the desired services.

>  
>  
> -----Original Message-----

> From: Patrick Depa [mailto:patrickdepa@yahoo.com]

> Sent: Friday, August 02, 2019 1:37 PM

> To: Christopher LeVasseur

> Subject: Re: Any updates

>  
> Yes, I'd be spending the night up there so I could just stick around  
> until noon.

>  
> Pat

>  
> Sent from my iPhone

>  
>> On Aug 2, 2019, at 10:07 AM, Christopher LeVasseur

>> <clevasseur@starkreagan.com> wrote:

>>  
>> Randy's attorney is flying into Portland on Saturday and will arrive  
>> around noon, so if you're still in Portland on Saturday, that might  
>> work out better for you. He would like to do it in a hotel near the airport.  
>> Let me know if that works for you.

>>  
>> Christopher E. LeVasseur

>> Stark Reagan, P.C.

>> 1111 W. Long Lake Road  
>> Troy, Michigan 48098  
>> Telephone: 248-641-9955  
>> Facsimile: 248-641-9921  
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>> engagement letter that would define the scope and limits of the desired services.

>>  
>>

>> -----Original Message-----

>> From: Patrick Depa [mailto:patrickdepa@yahoo.com]  
>> Sent: Thursday, August 01, 2019 11:50 PM  
>> To: Christopher LeVasseur  
>> Subject: Re: Any updates