

EXHIBIT 1

Katherine Aizpuru

From: Charles Harder <charder@harderllp.com>
Sent: Tuesday, July 9, 2019 4:46 PM
To: Hassan Zavareei
Cc: Katherine Aizpuru; Janet Varnell; Jennifer Bennett; bwarwick@varnellandwarwick.com; Tanya S. Koshy; Paul Bland; Karla Gilbride; Nicole Porzenheim; Melat Kiros; Ryan Stonerock; Henry Self; Steven Frackman; Dawn Siler-Nixon; Tracey Jaensch
Subject: RE: Your July 5, 2019 Production

We are happy to discuss, but a few things first:

1. We are currently preparing our two court filings due tomorrow, and thus will not have time to meet and confer on this issue until after those filings have been completed, thus, Thursday or Friday would be the soonest;

2. Your email does not indicate what this meet and confer is pertaining to, or the legal basis. If you could please provide that, it would allow us to actually prepare for the conference. For example, this would be a meet and confer regarding a Motion to XXX based upon FRCP Rule YYY, Local Rule ZZZ, etc. And if you have caselaw authority that would be all the more helpful to understand where you are coming from.

Also, for the record, I don't agree with your characterization of our document production. But rather than go back and forth on that in emails, we can discuss later this week.

Sincerely,

Charles Harder

From: Hassan Zavareei [mailto:hzavareei@tzlegal.com]
Sent: Monday, July 08, 2019 6:35 PM
To: Charles Harder
Cc: Katherine Aizpuru; Janet Varnell; Jennifer Bennett; bwarwick@varnellandwarwick.com; Tanya S. Koshy; Paul Bland; Karla Gilbride; Nicole Porzenheim; Melat Kiros; Ryan Stonerock; Henry Self; Steven Frackman; Dawn Siler-Nixon; Tracey Jaensch
Subject: Your July 5, 2019 Production

Charles,

I am writing to meet and confer regarding the eight-hour video that you produced on July 5, 2019. It appears that you took numerous individual videos and spliced them together and buried the key video at very end of the video (7:39:44). I cannot think of a legitimate reason why you would alter the numerous individual videos, strip out their metadata, and then merge them together into one.

I ask that you provide us with each individual video in unaltered form with the full metadata (ESI) immediately. I also ask that you tell me exactly how and when you obtained the video and why you waited until the eve of Ms. Johnson's deposition to produce it. The only metadata available shows that you had the video at least as early as June 13, 2019. I am available in the morning for a meet and confer telephone conference.

Thank you,

Hassan