

EXHIBIT 4

Katherine Aizpuru

From: Ryan Stonerock <RStonerock@harderllp.com>
Sent: Thursday, July 18, 2019 12:40 PM
To: Hassan Zavareei
Cc: JBennett@publicjustice.net; KGilbride@publicjustice.net; Katherine Aizpuru; bwarwick@varnellandwarwick.com; PBLAND@publicjustice.net; jvarnell@varnellandwarwick.com; Henry Self; Steven Frackman; DSiler-Nixon@fordharrison.com; TJAENSCH@fordharrison.com; Nicole Porzenheim; Charles Harder
Subject: RE: Johnson v. Trump - Case Number 8:19-cv-00475-WFJ-SPF

The following email is sent on behalf of Charles J. Harder who, as previously stated (see Dkt. 77), is out of the office on a family vacation until July 26, 2019.

Dear Mr. Zavareei:

We are writing in response to your letter dated July 15, 2019.

First, the assertion in your letter that Mr. Trump kissed your client is false. She kissed him.

Second, there is no operative complaint, and discovery has been stayed. Until such time that there is an operative complaint and discovery has resumed, we will not respond to the requests in your letter.

Third, the full-speed version of the video submitted to the Court and served on your office on Wednesday, July 10, is the same video that was produced during discovery. It was the full-length, unedited video taken by Brian Hayes on August 24, 2016, in the campaign RV.

Fourth, as we have already stated, if you re-file Ms. Johnson's battery claim, we will serve a Rule 11 motion, and file it at the appropriate time, seeking sanctions against you, your law firm, your co-counsel and Ms. Johnson. It is our understanding from the last hearing and accompanying transcript that Judge Jung delivered a clear message that if you re-file the battery claim, he will seriously consider imposing Rule 11 sanctions against plaintiff and her counsel. Thus, if you proceed to re-file the battery claim, you will do so at your own risk.

Sincerely,



RYAN J. STONEROCK
HARDER LLP
RSTONEROCK@HARDERLLP.COM
(424) 203-1600

From: Nicole Porzenheim <nporzenheim@tzlegal.com>
Sent: Monday, July 15, 2019 12:27 PM
To: Charles Harder <charder@harderllp.com>
Cc: JBennett@publicjustice.net; KGilbride@publicjustice.net; Katherine Aizpuru <kaizpuru@tzlegal.com>;

bwarwick@varnellandwarwick.com; PBLAND@publicjustice.net; Ryan Stonerock <RStonerock@harderllp.com>;
jvarnell@varnellandwarwick.com; Henry Self <hself@harderllp.com>; Steven Frackman <sfrackman@harderllp.com>;
DSiler-Nixon@fordharrison.com; TJAENSCH@fordharrison.com; Hassan Zavareei <hzavareei@tzlegal.com>
Subject: Johnson v. Trump - Case Number 8:19-cv-00475-WFJ-SPF

Counsel,

Please find the attached.

Best,



Nicole Porzenheim ■ Paralegal ■ TYCKO & ZAVAREEI LLP ■ www.tzlegal.com
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