From:	LLagostera, Domingo M.
To:	Jami Gollhofer; Jeana Goosmann
Cc:	Johnson, R. Scott; Donels, Cara; Palmer, Erica; mfrey@maynelaw.com; Dan MacLemore; Wood, Megan; Wong, Russell T.; Patton, Thomas; William Hale; Patton, Thomas; mfrey@maynelaw.com
Subject:	RE: Intirion Corporation v. College Products, Case No. 5:23-cv-04023-KEM - Status Conference re: Consolidation
Date:	Wednesday, May 3, 2023 9:27:17 PM
Attachments:	image001.jpg

CAUTION: EXTERNAL E-MAIL

Ms. Gollholfer,

For the hearing tomorrow, please see below the issues the parties are disputing regarding consolidation and their respective positions. The attorneys that are appearing at the hearing are also listed at the bottom of this email.

Kind Regards,

Domingo LLagostera

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Issue 1: should case nos. 5:23-cv-04002 and 5:23-cv-04023 be consolidated?

- **College Products' Position:** College Products' case (5:23-cv-04002) and Intirion's transfer case (5:23-cv-04023) involve the same parties, the same counsel, and common issues of fact and law, including infringement and invalidity of the same Intirion patents, and unfair competition claims related to Intirion's threats to assert those patents against College Products' customers. As such, the cases should be consolidated for convenience and economy in administration. *E.g.*, *Ackelson v. Aquawood*, LLC, No. 4:19-cv-00135, 2020 WL 1809708, at *2 (S.D. Iowa Feb. 3, 2020) (noting that where there is a common issue of law or fact, Rule 42(a) permits consolidation "as a matter of convenience and economy in administration") (quoting *Enterprise Bank v. Saettele*, 21 F.3d 233, 235 (8th Cir. 1994) (internal quotations omitted). "District courts enjoy substantial discretion in deciding whether and to what extent to consolidate cases." *Hall v. Hall*, 138 S. Ct. 1118, 1131 (2018). Below, Intirion argues this Court should dismiss case no. 5:23-cv-04002 for lack of personal jurisdiction. The Court asked the parties to summarize in this email their disputes as to consolidation. Intirion should not be making personal jurisdiction arguments at this time. For the sake of brevity, College Products asserts this Court has jurisdiction over Intirion for the reasons set forth in College Products' Amended Complaint (incorporated herein by reference). Case no. 5:23-cv-04002, Dkt. 15.

- **Intirion's Position:** Intirion believes there should be one case – the transferred case from Texas. The second filed Iowa action should be dismissed, not consolidated. College Products can then file its Answer and any counterclaims (to the extent they are viable, and College Products adequately pleads them) in the transferred affirmative infringement action. Dismissal of the second-filed Complaint in Case No. 23-CV-04002 (the "Declaratory Judgment Action") is appropriate because, *inter alia*, the Court lacks personal jurisdiction over Intirion in that case, the Declaratory Judgment Action was filed a year after Intirion's Complaint, includes facially deficient claims, and would improperly align the parties, putting the parties in positions inconsistent with the primary purpose of the litigation. The only connection any of the allegations in the Complaint have to Iowa is that College Products is an Iowa company. However, even assuming for the sake of argument that College Products has been harmed by any act of Intirion (it has not, nor has College Products adequately pled as much), personal jurisdiction cannot rest solely on the fact of harm in Iowa. *Walden v. Fiore*, 571 U.S. 277, 290 (2014) ("[M]ere injury to a forum resident is not a sufficient connection to the forum."). Additionally, the claims in the Declaratory Judgment Action should also be dismissed under Fed. R. Civ. Pro. 12(b)(6) as well as pursuant to the Court's discretion under the Declaratory Judgment Act, 28 U.S.C. § 2201, and the first-to-file rule. Intirion presently intends to appear in the Declaratory Judgment Action solely for the purpose of filing its motion to dismiss.

<u>Issue 2:</u> which case should be consolidated into which case?

- **College Products' Position:** College Products contends Intirion's transfer case (5:23-cv-04023) should be consolidated into College Products' case (case no. 5:23-cv-04002), such that College Products remains Plaintiff for the following reasons:

  A. On May 6, 2022, Intirion filed a patent infringement action in the WDTX (Waco Division), but there was no basis for venue there. While the parties disputed venue for almost a year, Intirion was sending letters to College Products' customers threatening them with patent litigation and defaming College Products' business and reputation. It became clear that if Intirion was dismissed from Waco, it would likely file in another improper venue and continue disrupting College Products' business. To prevent that from happening, College Products filed its declaratory judgment action and affirmative claims for unfair competition, tortious interference, and defamation in this Court, which is the **only** proper venue for Intirion's patent allegations. Subsequently, Intirion's case in Waco was transferred to this Court. The Honorable Alan Albright found all of Intirion's venue arguments unpersuasive, irrelevant, and/or unconvincing. College Products contends its case (case no. 5:23-cv-04002) should be the controlling case, and it should remain Plaintiff. College Products' case in this District was the first properly filed case. College Products also has its own affirmative claims against Intirion, including unfair competition. Intirion should not be the plaintiff because it should not be rewarded for its decision to file its patent claims in a clearly improper venue. *See, e.g.*, *USSC Holdings Corp. v. TK Prod., LLC*, No. 316CV00398RJCWGC, 2017 WL 11508197, at *3 (D. Nev. May 23, 2017) (designating the lead case as the first case filed in a proper forum, not the first

case filed overall).

B. Intirion argues College Products' case (5:23-cv-04002) should be consolidated into Intirion's transfer case (5:23-cv-04023) because College Products' claims can only be determined by resolving the issue of infringement. That is not correct. College Products has asserted affirmative claims based on Intirion disrupting its business and sending threatening letters to its customers. Those claims, while related, are not compulsory counterclaims and not dependent on the resolution of Intirion's infringement claims. College Products also bears the burden of proof on those claims. Further, College Products filed those claims first in a proper forum. It should therefore be the plaintiff in the consolidated cases.

- **Intirion's Position:** To the extent consolidation is appropriate, College Products' claim(s) should be consolidated into Intirion's first-filed Case No. 23-CV-04023 (the "Affirmative Infringement Action") with Intirion as the plaintiff for the following reasons:

A. The primary purpose of this litigation is Intirion's claims of patent infringement, and College Product's claims are properly characterized as defenses and counterclaims. Intirion has asserted that College Products infringes Intirion's patents—College Products's claims (which are not adequately pled) can only be determined by resolving the issue of infringement. Thus, consolidation into Intirion's affirmative case, Case No. 23-CV-04023, would ensure proper alignment of the parties and is consistent with the primary purpose of this litigation. *Kerr Corp. v. N. Am. Dental Wholesalers, Inc.*, No. SACV 11-0313 DOC CWX, 2011 WL 4965111, at *3 (C.D. Cal. Oct. 18, 2011) (noting "common-sense rule that where a plaintiff seeks declaratory relief that it is not liable and the defendant counterclaims that plaintiff is liable, it is more logical to realign the parties so that the defendant becomes the plaintiff."); *see also Plumtree Software, Inc. v. Datamize, LLC*, No. C 02-5693 VRW, 2003 WL 25841157, at *3 (N.D. Cal. Oct. 6, 2003) (re-aligning the parties in a declaratory judgment action noting the patentee (i.e., the party bearing the burden on infringement), "is more properly considered the natural plaintiff in this action than is [the alleged infringer]"). College Products argues the Court should consolidate Intirion's first-filed infringement action into College Products' retaliatory Declaratory Judgment Action because not all of its claims are dependent on resolving infringement—apparently attempting to refer to the claims it added via the Amended Complaint filed just last week (Counts 9-13). As College Products is well aware, College Product based these new claims on Intirion's allegations of infringement or what College Products characterizes as alleged threats of patent infringement. *See, e.g.*, Declaratory Judgment Action Amended Complaint, ¶¶ 154-155, 162, 164-166, 171, 172, 174, 178, 180, 182. Thus, College Products' arguments ring hollow and instead further underscore that the "primary purpose" of this case is litigating infringement. Moreover, regardless, Intirion intends to move to dismiss these new claims under at least Fed. R. Civ. P. 12(b)(2) and (12)(b)(6) and thus they are irrelevant to consolidation. Finally, College Products did not add these deficient claims until after Intirion's first-filed case was transferred from Texas ***and*** after College Products suggested consolidation during a discussion between the parties, in what appears to be an attempt to bolster its weak consolidation argument. College Products apparent gamesmanship should not be rewarded.

B. Any residual claims should also be consolidated into Intirion's affirmative case, Case No. 23-CV-04023, because **Intirion filed its action first**, in the Western District of Texas. *See Kerr Corp.* 2011 WL 4965111, at *4 (finding consolidation and realignment of the parties into the first-filed (but transferred) action

appropriate to avoid "creat[ing] a multiplicity of actions, wast[ing] judicial resources, and unduly burden[ing] the litigation process"). While Intirion continues to believe venue was proper in the Western District of Texas, that the case was transferred is of no matter because, "[t]he filing date of an action derives from the filing of the complaint." *Commc'ns Test Design, Inc. v. Contec, LLC*, 952 F.3d 1356, 1362 (Fed. Cir. 2020) (citing Fed. R. Civ. P. 3). And College Products did not file its Declaratory Judgment Action until eight months after Intirion had filed its Affirmative Infringement Action. Pursuant to the first-to-file rule, Intirion's affirmative case should continue. *See Merial Ltd. v. Cipla Ltd.*, 681 F.3d 1283, 1299 (Fed. Cir. 2012) ("Under the first-to-file rule, a district court may choose to stay, transfer, or dismiss a duplicative later-filed action . . . .").

C. College Products' retaliatory declaratory judgment action is inconsistent with the purposes of the Declaratory Judgment Act (e.g., College Products did not simply file suit to "clear the air" or to make a preemptive strike against anticipated litigation) and inconsistent with the conservation of judicial resources, and should not be rewarded. *See, e.g.*, *Elecs. for Imaging, Inc. v. Coyle*, 394 F.3d 1341, 1346 (Fed. Cir. 2005) ("the purpose of the Declaratory Judgment Act . . . in patent cases is to provide the allegedly infringing party relief from uncertainty and delay regarding its legal rights." (citation omitted)); *Nexans Inc. v. Belden Inc.*, 966 F. Supp. 2d 396, 404 (D. Del. 2013) ("The Declaratory Judgment Act specifically allows declaratory judgment actions for parties facing accusations of patent infringement to 'clear the air' regarding their accused products." (citation omitted)).

D. Proceeding in Intirion's affirmative infringement case, Case No. 23-CV-04023, will streamline the issues and allow the case to move forward in the "traditional" manner, *i.e.*, with the party bearing the burden on infringement as the plaintiff, and the party defending infringement as the defendant. *See* 6A-19 Donald S. Chisum, Chisum on Patents § 19.02[1] ("In traditional terms, infringement constitutes the case in chief of the plaintiff or patent owner."); *Biosite, Inc. v. XOMA Ltd*., 168 F. Supp. 2d 1161, 1165 (N.D. Cal. 2001) ("The direct action . . . is less confusing for the court and jury."); *Plumtree Software, Inc. v. Datamize, LLC*, No. C 02-5693 VRW, 2003 WL 25841157, at *3 (N.D. Cal. Oct. 6, 2003) (patentee as plaintiff will "aid in the logical presentation of evidence at trial").

E. As noted with respect to Issue 1, Intirion presently intends to appear in the Declaratory Judgment Action solely for purposes of filing its motion to dismiss. To the extent any of College Products' claims are not dismissed, the claims should be consolidated into Intirion's Affirmative Infringement Action. Consolidating the cases into a second-filed Declaratory Judgment Action that should be dismissed risks wasting judicial resources.

F. Finally, consolidation of Intirion's affirmative infringement case into College Products' declaratory judgment action would allow the case to proceed as if Intirion never filed its infringement case—the exact outcome the Texas Court denied College Products when the Court refused to dismiss Intirion's first-filed case.

<u>Issue 3:</u> when should the cases be consolidated?

- **College Products' Position:** College Products contends the cases should be consolidated immediately. Both cases are in their infancies. Neither party has answered. Nor have scheduling orders been entered. Any delay in consolidation will unnecessarily waste judicial resources in parallel litigation over the same issues. We understand Intirion's

position is that it must file a Rule 12 dismissal motions prior to consolidation. It has not provided any basis or legal support for its position. Regardless of which case is consolidated into which, Intirion can file Rule 12 motions right after the consolidation. College Products has already informed Intirion it will not argue Intirion has waived any Rule 12 motions, including lack of personal jurisdiction.

- **Intirion's Position:** The cases should be consolidated after resolution of Intirion's upcoming motion to dismiss.

Attorneys Appearing for the Hearing:

- **On College Products' Behalf:** Domingo LLagostera and Jeana Goosmann.

- **On Intirion's Behalf:** R. Scott Johnson, Thomas Patton, Cara Donels, and Michael Frey.

From: Jami Gollhofer <Jami_Gollhofer@iand.uscourts.gov>
Sent: Wednesday, May 3, 2023 12:04 PM
To: LLagostera, Domingo M. <domingo.llagostera@blankrome.com>; Jeana Goosmann <GoosmannJ@Goosmannlaw.com>
Cc: Johnson, R. Scott <RSJohnson@fredlaw.com>; Donels, Cara <CDonels@fredlaw.com>; epalmer_fredlaw.com <epalmer@fredlaw.com>; mfrey@maynelaw.com; Dan MacLemore <maclemore@thetexasfirm.com>; Wood, Megan <megan.wood@blankrome.com>; Wong, Russell T. <russell.wong@blankrome.com>; tpatton_fredlaw.com <tpatton@fredlaw.com>; William Hale <HaleW@goosmannlaw.com>; tpatton_fredlaw.com <tpatton@fredlaw.com>; mfrey@maynelaw.com
Subject: RE: Intirion Corporation v. College Products, Case No. 5:23-cv-04023-KEM - Status Conference re: Consolidation

Additionally – please include with your list of issues for hearing which attorneys from each side will be appearing for hearing.

Thank you.

jami - Chief KEM

From: LLagostera, Domingo M. <domingo.llagostera@blankrome.com>
Sent: Wednesday, May 3, 2023 11:41 AM
To: Jami Gollhofer <Jami_Gollhofer@iand.uscourts.gov>; Jeana Goosmann

<GoosmannJ@Goosmannlaw.com>
Cc: Johnson, R. Scott <RSJohnson@fredlaw.com>; Donels, Cara <CDonels@fredlaw.com>; epalmer_fredlaw.com <epalmer@fredlaw.com>; mfrey@maynelaw.com; Dan MacLemore <maclemore@thetexasfirm.com>; Wood, Megan <megan.wood@blankrome.com>; Wong, Russell T. <russell.wong@blankrome.com>; tpatton_fredlaw.com <tpatton@fredlaw.com>; William Hale <HaleW@goosmannlaw.com>; tpatton_fredlaw.com <tpatton@fredlaw.com>; mfrey@maynelaw.com
Subject: RE: Intirion Corporation v. College Products, Case No. 5:23-cv-04023-KEM - Status Conference re: Consolidation

CAUTION - EXTERNAL:

The parties are both available tomorrow for a telephonic zoom at 2 pm. We do not think this hearing will take any longer than 30 minutes. The parties are working towards sending an issues list some time later today.

Thank you,

Domingo LLagostera

From: Jami Gollhofer <Jami_Gollhofer@iand.uscourts.gov>
Sent: Wednesday, May 3, 2023 11:30 AM
To: LLagostera, Domingo M. <domingo.llagostera@blankrome.com>; Jeana Goosmann <GoosmannJ@Goosmannlaw.com>
Cc: Johnson, R. Scott <RSJohnson@fredlaw.com>; Donels, Cara <CDonels@fredlaw.com>; epalmer_fredlaw.com <epalmer@fredlaw.com>; mfrey@maynelaw.com; Dan MacLemore <maclemore@thetexasfirm.com>; Wood, Megan <megan.wood@blankrome.com>; Wong, Russell T. <russell.wong@blankrome.com>; tpatton_fredlaw.com <tpatton@fredlaw.com>; William Hale <HaleW@goosmannlaw.com>; tpatton_fredlaw.com <tpatton@fredlaw.com>; mfrey@maynelaw.com
Subject: RE: Intirion Corporation v. College Products, Case No. 5:23-cv-04023-KEM - Status Conference re: Consolidation

> You don't often get email from jami_gollhofer@iand.uscourts.gov. Learn why this is important

Additionally – tomorrow's availability just opened up to include 9:30 or 10:00 AM (Thursday, May 4)

jami - Chief KEM

From: LLagostera, Domingo M. <domingo.llagostera@blankrome.com>
Sent: Wednesday, May 3, 2023 11:27 AM

To: Jami Gollhofer <Jami_Gollhofer@iand.uscourts.gov>; Jeana Goosmann <GoosmannJ@Goosmannlaw.com>
Cc: Johnson, R. Scott <RSJohnson@fredlaw.com>; Donels, Cara <CDonels@fredlaw.com>; epalmer_fredlaw.com <epalmer@fredlaw.com>; mfrey@maynelaw.com; Dan MacLemore <maclemore@thetexasfirm.com>; Wood, Megan <megan.wood@blankrome.com>; Wong, Russell T. <russell.wong@blankrome.com>; tpatton_fredlaw.com <tpatton@fredlaw.com>; William Hale <HaleW@goosmannlaw.com>; tpatton_fredlaw.com <tpatton@fredlaw.com>; mfrey@maynelaw.com
Subject: RE: Intirion Corporation v. College Products, Case No. 5:23-cv-04023-KEM - Status Conference re: Consolidation

CAUTION - EXTERNAL:

Thank you for the quick response. We are working with Intirion's counsel on an amicable time/date and will get back to the Court shortly.

Kind Regards,

Domingo LLagostera

Counsel for College Products, Inc.

Domingo M. LLagostera | Blank Rome LLP
717 Texas Ave., Suite 1400 | Houston, TX 77002
Phone: 713.632.8682 | Fax: 713.228.6605 | Email: DLLagostera@BlankRome.com

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From: Jami Gollhofer <Jami_Gollhofer@iand.uscourts.gov>
Sent: Wednesday, May 3, 2023 11:05 AM
To: Jeana Goosmann <GoosmannJ@Goosmannlaw.com>
Cc: Johnson, R. Scott <RSJohnson@fredlaw.com>; Donels, Cara <CDonels@fredlaw.com>; epalmer_fredlaw.com <epalmer@fredlaw.com>; mfrey@maynelaw.com; Dan MacLemore <maclemore@thetexasfirm.com>; Wood, Megan <megan.wood@blankrome.com>; Wong, Russell T. <russell.wong@blankrome.com>; tpatton_fredlaw.com <tpatton@fredlaw.com>; LLagostera, Domingo M. <domingo.llagostera@blankrome.com>; William Hale <HaleW@goosmannlaw.com>; tpatton_fredlaw.com <tpatton@fredlaw.com>; mfrey@maynelaw.com
Subject: RE: Intirion Corporation v. College Products, Case No. 5:23-cv-04023-KEM - Status Conference re: Consolidation

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Counsel –

I am not certain how long you estimate any hearing will take, but Judge Mahoney has availability for a status conference hearing (telephonic Zoom):

Today - Wednesday, May 3 at 2:30 PM (or later)
Thursday, May 4 at 11:15 AM or 1:30, 2:00, or 2:30 PM

Judge Mahoney is out of the office on Friday, May 5.

The brief outline of the parties' positions on the issues to be discussed at the hearing (bullet-point or similar format is preferred) will be due in advance of the hearing.

jami - Chief KEM

From: Jeana Goosmann <GoosmannJ@Goosmannlaw.com>
Sent: Tuesday, May 2, 2023 8:55 PM
To: Kelly Mahoney <Kelly_Mahoney@iand.uscourts.gov>; Jami Gollhofer <Jami_Gollhofer@iand.uscourts.gov>
Cc: Johnson, R. Scott <RSJohnson@fredlaw.com>; Donels, Cara <CDonels@fredlaw.com>; epalmer_fredlaw.com <epalmer@fredlaw.com>; mfrey@maynelaw.com; Dan MacLemore <maclemore@thetexasfirm.com>; Wood, Megan <megan.wood@blankrome.com>; Wong, Russell T. <russell.wong@blankrome.com>; tpatton_fredlaw.com <tpatton@fredlaw.com>; LLagostera, Domingo M. <domingo.llagostera@blankrome.com>; William Hale <HaleW@goosmannlaw.com>
Subject: Re: Intirion Corporation v. College Products, Case No. 5:23-cv-04023-KEM - Status Conference re: Consolidation

CAUTION - EXTERNAL:

We will all follow up accordingly.
Thank you.

Sincerely,
JEANA GOOSMANN
Managing Attorney/CEO
Goosmann Law Firm
O: 712-226-4000 | C: 712-251-2250

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From: Kelly Mahoney <Kelly_Mahoney@iand.uscourts.gov>
Sent: Tuesday, May 2, 2023 7:16:44 PM
To: Jeana Goosmann <GoosmannJ@Goosmannlaw.com>; Jami Gollhofer <Jami_Gollhofer@iand.uscourts.gov>
Cc: Johnson, R. Scott <RSJohnson@fredlaw.com>; Donels, Cara <CDonels@fredlaw.com>; epalmer_fredlaw.com <epalmer@fredlaw.com>; mfrey@maynelaw.com <mfrey@maynelaw.com>; Dan MacLemore <maclemore@thetexasfirm.com>; Wood, Megan <megan.wood@blankrome.com>; Wong, Russell T. <russell.wong@blankrome.com>; tpatton_fredlaw.com <tpatton@fredlaw.com>; LLagostera, Domingo M. <domingo.llagostera@blankrome.com>; William Hale <HaleW@goosmannlaw.com>
Subject: RE: Intirion Corporation v. College Products, Case No. 5:23-cv-04023-KEM - Status Conference re: Consolidation

CAUTION: This email originated from outside of the Goosmann Law Firm email system. Do not click links or open attachments unless you expected the email or have verified its authenticity.

Dear Counsel:

Jami Gollhofer will be in contact with you to schedule a status conference. Prior to the status conference, it would be helpful to have a brief outline of the parties' positions on the issues you list below (bullet-points or similar format is preferred). This will help make the status conference more efficient.

We can take up the May 5 deadline for the proposed scheduling order during the status conference (if it's held this week). Otherwise you can file a short motion to extend, and I will take it up in that manner.

Sincerely,
Kelly K.E. Mahoney
Chief Magistrate Judge
U.S. District Court, Northern District of Iowa

From: Jeana Goosmann <GoosmannJ@Goosmannlaw.com>
Sent: Tuesday, May 2, 2023 6:19 PM
To: Kelly Mahoney <Kelly_Mahoney@iand.uscourts.gov>; Jami Gollhofer <Jami_Gollhofer@iand.uscourts.gov>
Cc: Johnson, R. Scott <RSJohnson@fredlaw.com>; Donels, Cara <CDonels@fredlaw.com>; epalmer_fredlaw.com <epalmer@fredlaw.com>; mfrey@maynelaw.com; Dan MacLemore <maclemore@thetexasfirm.com>; Wood, Megan <megan.wood@blankrome.com>; Wong, Russell T. <russell.wong@blankrome.com>; tpatton_fredlaw.com <tpatton@fredlaw.com>; LLagostera,

Domingo M. <domingo.llagostera@blankrome.com>; William Hale <HaleW@goosmannlaw.com>
Subject: RE: Intirion Corporation v. College Products, Case No. 5:23-cv-04023-KEM - Status Conference re: Consolidation

CAUTION - EXTERNAL:

Your Honor,

We represent College Products, Inc. and write to request a status conference with the Court to discuss consolidation of these related matters.

On May 6, 2022, Intirion filed a patent infringement action against College Products in the Western District of Texas (Waco Division). College Products moved to dismiss the action for lack of venue. While College Products' motion to dismiss was pending, on January 5, 2023, College Products filed its Declaratory Judgment action with this Court, which was assigned case no. 5:23-cv-04002. Subsequently, the Honorable Alan Albright of the Western District of Texas transferred Intirion's action to this Court, which was assigned case no. 5:23-cv-04023.

We write to respectfully request a status conference with the Court to discuss consolidation of the above-referenced actions. To the extent consolidation is appropriate, the parties disagree on (i) the timing of the consolidation, (ii) which case should be consolidated into which case, and (iii) which party should be listed as Plaintiff. College Products believes a status conference would be helpful to resolve these disputes and conserve resources that will otherwise be wasted on simultaneously litigating two parallel related cases. Moreover, a proposed scheduling order is due in case no. 5:23-cv-04023 this Friday, May 5. College Products requests this date be continued pending the status conference so that the parties can negotiate one schedule for the consolidated case.

Intirion's counsel is copied on this email.

We look forward to your response and appreciate your time and attention.

Sincerely,

JEANA GOOSMANN
Managing Attorney/CEO | Goosmann Law Firm
O: 712-226-7401 | C: 712-251-2250 | Iowa, Nebraska, South Dakota
StrengthsFinder: Strategic | Activator | Competition | Futuristic | Relator

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