
From: Michael Bradford <mbradford@luedeka.com>
Sent: Wednesday, September 16, 2026 10:15 AM
To: Marc Lorelli
Cc: Linda Prichard; HPBL0101L
Subject: RE: Holley Performance Products v. ACES Fuel Injection

Marc,

He does not have a copy of the agreement in his possession. Also, as I advised on September 10:

Mr. Farrell will be out of town the week of October 5, so that does not work. I believe he is available later in October. Otherwise, it looks like it needs to be September 28. We can have the deposition at my office at 900 S. Gay Street, Suite 1504, Knoxville, TN 37902.

Thanks

Michael

From: Marc Lorelli <mlorelli@brookskushman.com>
Sent: Wednesday, September 16, 2026 9:59 AM
To: Michael Bradford <mbradford@luedeka.com>
Cc: Linda Prichard <lprichard@luedeka.com>; HPBL0101L <HPBL0101L@brookskushman.com>
Subject: RE: Holley Performance Products v. ACES Fuel Injection

Michael –

Thank you for the production of documents in Mr. Farrell's possession, custody, or control responsive to our subpoena.

Mr. Farrell has referenced in a recent declaration a Patent Acquisition and License Agreement with Aces dated October 31, 2022. Those documents were not in the production. Do you have that Agreement to produce? Please advise asap.

Also, can you please let us know when Mr. Farrell would be available for deposition the week of October 5, 2026 and what location would be convenient.

Thanks, Marc

From: Michael Bradford <mbradford@luedeka.com>
Sent: Wednesday, September 16, 2026 8:21 AM
To: Marc Lorelli <mlorelli@brookskushman.com>
Cc: Linda Prichard <lprichard@luedeka.com>; HPBL0101L <HPBL0101L@brookskushman.com>
Subject: RE: Holley Performance Products v. ACES Fuel Injection

Marc,

Mr. Farrell's documents in response to the subpoena are attached. As you will see, he is not in possession of many responsive documents. Also, please note some of the documents have been designated Attorneys Eyes Only.

Let me know if you have any questions.

Thanks

Michael

Michael J. Bradford, Esq.

Intellectual Property Attorney

Luedeka Neely | PO Box 1871 Knoxville TN 37901 | T.865.546.4305 | F.865.523.4478 | <http://www.Luedeka.com>

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From: Marc Lorelli <mlorelli@brookskushman.com>
Sent: Tuesday, September 15, 2026 9:04 AM
To: Michael Bradford <mbradford@luedeka.com>
Cc: Linda Prichard <lprichard@luedeka.com>; HPBL0101L <HPBL0101L@brookskushman.com>
Subject: RE: Holley Performance Products v. ACES Fuel Injection

Thanks for the update Michael – we look forward to your production tomorrow. Marc

From: Michael Bradford <mbradford@luedeka.com>
Sent: Monday, September 14, 2026 1:31 PM
To: Marc Lorelli <mlorelli@brookskushman.com>
Cc: Linda Prichard <lprichard@luedeka.com>
Subject: RE: Holley Performance Products v. ACES Fuel Injection

Marc,

Our client needs a few more days to provide documents. We hope to be able to provide them by this Wednesday.

Thanks

Michael

From: Marc Lorelli <mlorelli@brookskushman.com>
Sent: Tuesday, September 8, 2026 1:46 PM
To: Michael Bradford <mbradford@luedeka.com>
Cc: Linda Prichard <lprichard@luedeka.com>
Subject: RE: Holley Performance Products v. ACES Fuel Injection

Hi Michael –

Of those two dates September 28 is preferred. As I indicated, September is desired, but please advise if Mr. Farrell is available any days the following week (week of Oct. 5).

Please advise when we can expect to receive documents. We would hope to receive documents no later than September 14th.

Thanks, Marc

From: Michael Bradford <mbradford@luedeka.com>
Sent: Wednesday, September 2, 2026 2:27 PM
To: Marc Lorelli <mlorelli@brookskushman.com>
Cc: Linda Prichard <lprichard@luedeka.com>
Subject: RE: Holley Performance Products v. ACES Fuel Injection

Marc,

The only dates that will work for Mr. Farrell's deposition in September are September 28-29. Let me know if either date works.

I still need to discuss documents with Mr. Farrell and I will be in touch.

Thanks

Michael

Michael J. Bradford, Esq.

Intellectual Property Attorney

Luedeka Neely | PO Box 1871 Knoxville TN 37901 | T.865.546.4305 | F.865.523.4478 | <http://www.Luedeka.com>

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From: Marc Lorelli <mlorelli@brookskushman.com>
Sent: Wednesday, September 2, 2026 12:43 PM
To: Michael Bradford <mbradford@luedeka.com>
Subject: RE: Holley Performance Products v. ACES Fuel Injection

Michael –

Thanks for the call today. To recap, we are amendable to an extension. As we discussed, you would provide a proposed date within the next two weeks for the document deadline. You will also offer some available dates for deposition as you indicated September 15th will not work. We understand that the deposition may be in California or Tennessee, but we would still like to take the deposition in person prior to the end of September.

Best, Marc

Marc Lorelli

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From: Marc Lorelli
Sent: Wednesday, September 2, 2026 12:32 PM
To: 'mbradford@luedeka.com' <mbradford@luedeka.com>
Subject: FW: Holley Performance Products v. ACES Fuel Injection

From: Marc Lorelli <mlorelli@brookskushman.com>
Sent: Monday, August 24, 2026 9:21 AM
To: raltman@raineslaw.com
Cc: HPBL0101L <HPBL0101L@brookskushman.com>
Subject: FW: Holley Performance Products v. ACES Fuel Injection

Hi Ron –

We were just informed that you represent Mr. Farrell. Can you advise whether you will accept service of the attached subpoena on his behalf?

If you have any questions or would like to discuss, please let me know.

Regards, Marc

Marc Lorelli

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From: Nicole L. Solomon <NWancour@brookskushman.com>
Sent: Wednesday, August 19, 2026 3:47 PM
To: info@raineslaw.com
Cc: HPBL0101L <HPBL0101L@brookskushman.com>; Jessica Malloy-Thorpe <jessica.malloy-thorpe@millermartin.com>
Subject: Holley Performance Products v. ACES Fuel Injection

Counsel,

Please see the attached letter regarding a subpoena directed to Kenneth Farrell.

Thank you.

Nicole Solomon
Litigation Assistant
D: (248) 226-2709
nwancour@brookskushman.com

 **BROOKS**
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