



MCGEARY CUKOR
INTELLECTUAL PROPERTY LAW

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March 10, 2025

ZAGER FUCHS, P.C.
Michael T. Warshaw,
119 Avenue at the Commons
Suite 4
Shrewsbury, New Jersey 07702
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Ed Miller
edmillerlaw@gmail.com

RE: Vision Industries Group, Inc. v. ACU Plasmold, Inc.
Case No.: 2:18-cv-06296-ES-CLW

Dear Michael and Ed:

This letter is to address Mr. Miller's recent email communications and to follow up on my March 5 letter.

Mr. Miller sent an email on March 9 stating, in its entirety:

It seems that there may be some questionable claims on Mr. Lanterman's resume starting with the "post-graduate" course at Harvard. Please confirm that the resume is accurate.

Discovery has long been closed. Vision is determined to work with ACU to prepare for an orderly trial. Without an Order, Vision will not engage with ACU on new theories or new defenses that have not been part of the case and that seem to be focused on derailing the trial. We consider this issue resolved. If you disagree, please explain your legal basis for asking for more discovery now.

Mr. Miller also sent an email on March 6 stating, in its entirety:

Please include any responses from Plaintiff or Plaintiff's lawyers upon receiving the initial translation to the translation company asking for a "request revision" or similar option.

As discussed above, discovery has long been closed and the parties have been Ordered to prepare for trial as per the existing schedule. As per above, we consider this issue resolved. If you disagree, please explain your legal basis for requesting more information.

McGeary Cukor LLC

Mr. Michael Warshaw

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The Scheduling Order requires that the parties file a joint statement of the case by March 31. We will send you a proposal on March 19 for you to review and edit and return by March 26. If that time frame does not work for you, please propose another time frame that will. Since we are preparing for trial, we will not be able to work on the joint statement of the case with you after March 26.

Lastly, as we explained on March 5, we will not agree to any delay of the trial so please do not ask us to consent to any extension.

Respectfully,

A handwritten signature in black ink, appearing to read "Michael Cukor". The signature is fluid and cursive, with the first name "Michael" written in a larger, more prominent script than the last name "Cukor".

Michael Cukor