

Belo, Vladimir

From: Pollack, Jeffrey S. [JSPollack@duanemorris.com]
Sent: Thursday, July 03, 2014 12:55 PM
To: Connor, Thomas
Cc: Taylor, Matthew A.; Beausoleil, James L.; Porter, William G. (WGPorter@vorys.com); wasieck@vorys.com; Jevicky, John; McCauley, John; Davis, Allison; Belo, Vladimir
Subject: American Energy Corporation v. American Energy Partners, LP, et al.
Attachments: 20140703112538080.pdf

Tom: Please see the attached.

Regards,

Jeff



Jeffrey S. Pollack
Partner

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June 24, 2014

VIA EMAIL

Thomas M. Connor
Dinsmore & Shohl, LLP
255 East Fifth Street, Suite 1900
Cincinnati, Ohio 45202

Re: *American Energy Corporation v. American Energy Partners,
LP, et al., No. 13-886*

Dear Tom:

We write in response to Plaintiff's June 27, 2014 letter. We have set forth Defendants' position in detail in our previous correspondence and will not repeat it here. As stated in our June 11, 2014 and June 24, 2014 letters, if there remains a dispute as to whether leases are reasonably calculated to lead to the discovery of admissible evidence, plaintiff should brief, as set forth in Judge Abel's Order, "why the leases are relevant and proffer any evidence it has of land owner confusion about who is seeking to obtain natural gas/oil/mineral leases from them." The law Plaintiff cites in its most recent letter does not support Plaintiff's position that leases are relevant and Plaintiff fails to address what evidence it has of alleged land owner confusion.

Sincerely,



Jeffrey S. Pollack

JSP:

cc: Matthew A. Taylor, Esquire (via e-mail)
James L. Beausoleil, Esquire (via email)
William G. Porter, Esquire (via e-mail)

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June 24, 2014
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