

Subject: Re: Documents on CD for Rule 26 disclosures...
Date: Wednesday, May 7, 2008 11:19 AM
From: Samuel Lipari <Saml@MedicalSupplyChain.com>
Reply-To: Samuel Lipari <saml@medicalsupplychain.com>
To: Jay Heidrick jheidrick@stklaw.com
Conversation: Documents on CD for Rule 26 disclosures...

Jay,

Sorry for the misunderstanding. I have not password protected any of the files. I think we are using two different meanings of searchable, the table of contents leads you to documents by keywords. Some are scanned images where keyword searching, cutting and pasting is not possible. Some were made into pdfs with the software I could afford, not Adobe and you have to go into the properties section to alter or save.

You are no doubt inconvenienced but that is the software I have and the form I have created and store the pdfs in the normal course of business. You on the other hand give me only the paper versions of MS Word documents for the few docs you have produced in discovery even though I have requested only electronic documents. I hope this helps. Best regards, S~

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----- Original Message -----

From: [Jay Heidrick](#)
To: [Samuel Lipari](#)
Cc: [Jay Heidrick](#)
Sent: Wednesday, May 07, 2008 9:54 AM
Subject: Documents on CD for Rule 26 disclosures...

Sam-

In your response to our Motion to Compel, you indicated that the CD of documents you provided were searchable. That is not the case. The files are password protected that prevent any type of OCR, re-printing as a .pdf and searching. Please provide the password that will allow us to change the security setting for these files and make them searchable. Or please provide us with a new CD that allows OCR and searchable functions. Thanks.

Jay



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