

Nelson Mullins

Nelson Mullins Riley & Scarborough LLP

Attorneys and Counselors at Law

151 Meeting Street / Sixth Floor / Charleston, SC 29401-2239

Tel: 843.853.5200 Fax: 843.720.4353

www.nelsonmullins.com

Richard A. Farrier, Jr.

Tel: 843.720.4301

Fax: 843.720.4353

richard.farrier@nelsonmullins.com

June 21, 2007

Via Facsimile

Frank M. Cisa, Esq.
Cisa & Dodds, LLP
622 Johnnie Dodds Boulevard
Mt. Pleasant, SC 29464

RE: Trademark Properties and Richard C. Davis v. A&E Television Networks and
Max Weissman Productions, Inc. d/b/a Departure Films
USDC Civil Action No.: 2:06-CV-2195-CWH
Our File No.: 28692/01500

Dear Frank:

Thank you for your letter dated June 7, 2007. Defendants are prepared to work cooperatively to complete discovery on the new schedule set by Judge Houck. I will give you a call to discuss setting an agreed schedule for getting all this done. The schedule will have to include us getting you the discovery that you still reasonably need, and you getting us a number of things as well.

A quick review of the file indicates these gaps in plaintiffs' discovery responses:

- In plaintiffs' amended answer No. 2 to defendants' first set of interrogatories, you stated that plaintiffs have "invoices and statements concerning the Plaintiffs' claim for damages." Please provide us with all such documents.
- Although you provided us with an "Exhibit A" in response to our document requests Nos. 3 and 4, that exhibit contains merely a summary with no underlying information. Please provide us with all documents forming the basis for the numbers contained in the exhibit, especially those contained in page one (the "Hawthorn Suites" page) of the exhibit.
- Document request No. 5 was a request for documents sufficient to show plaintiffs' financial condition at year-end for every year from 2003 to the present. Although you have sent us plaintiffs' year-end financial statements for

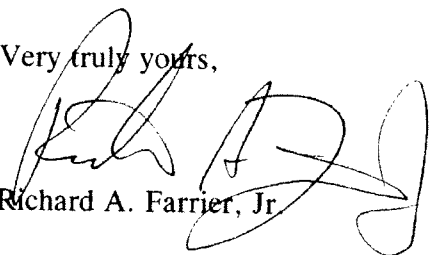
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the years 2003-2005, we do not have such a statement for the year 2006. Please provide it to us.

- Document request No. 5 asked for “documents,” which were defined to include “tax returns.” We have not received any tax returns for plaintiffs. Please produce tax returns, both for Richard Davis individually and for Trademark Properties, Inc., for every year from 2003 to the present.
- During the depositions of Mr. Davis, Ginger Alexander and Trademark Properties, the witnesses identified several items that were responsive to our document requests, but have not yet been produced in discovery. I listed those items in my letter dated March 22, 2007 and also followed up with an email (copies attached). To date, we not received any response. Please produce those documents to us.

Defendants reserve all rights to request additional relevant documents and information. Thank you in advance for your courtesy in this matter.

Very truly yours,


Richard A. Farrier, Jr

RAFJR:dh
Enclosure

cc: Jeremy Feigelson, Esq.