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January 10, 2008

Via E-Mail and Hand Delivery

Frank M. Cisa, Esq.

Cisa & Dodds, LLP

858 Lowcountry Blvd., Suite 101

Mt. Pleasant, SC 29464

RE: Trademark Properties and Richard C. Davis v. A&E Television Networks and
Departure Films
USDC Civil Action No.: 2:06-CV-2195-CWH
Our File No.: 28692/01500
Chubb File No. 133228

Dear Frank:

This letter confirms the depositions we intend to take before the February 1, 2008 discovery cutoff:

- Each of Richard Davis and Trademark Properties, Inc. on damages issues;
- Each of Ginger Alexander, Mr. Davis and Trademark Properties on fact issues, focusing primarily on the documents that were (and will be) produced by plaintiffs and third parties after the March 2007 depositions; and
- Mark Halloran, plaintiffs' expert witness. It is our understanding that Mr. Halloran is serving as plaintiffs' expert on damages, pursuant to his December 14 report, and also as plaintiffs' expert on industry practice, pursuant to an additional report to be provided by January 18.

The depositions of Mr. Davis, Trademark Properties, and Mr. Halloran will likely each last a full day. Ms. Alexander's deposition probably can be completed in a half-day.

Exhibit A

Frank M. Cisa, Esq.
January 10, 2008
Page 2

We ask that you make Trademark Properties, Mr. Davis and Ms. Alexander available during the week of January 21, and Mr. Halloran during the week of January 28. To that end, we enclose for service upon you the following documents:

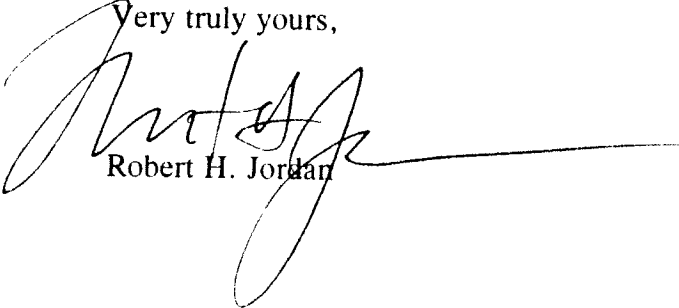
1. Notice of Continued Deposition of Richard C. Davis;
2. Notice of Continued Rule 30(b)(6) Deposition of Trademark Properties, Inc.;
3. Notice of Continued Deposition of Virginia Macon Alexander and related Subpoena; and
4. Notice of Deposition of Mark Halloran and related Subpoena.

We assume you will accept service of the Subpoenas to Ms. Alexander and Mr. Halloran and have therefore enclosed Acceptance of Service forms for your execution and return. However, if this is not the case, please let me know immediately and we will arrange service by other means.

The deposition dates of course will be contingent on the timely completion of plaintiffs' document production, including a response to the enclosed Subpoena we are serving today with respect to Mr. Halloran. Please note that, although Mr. Halloran's deposition is scheduled for January 31, the subpoena requires the document production to take place on or before January 22, 2008.

Thank you for your cooperation.

Very truly yours,



Robert H. Jordan

RHJ:ll
Enclosures

cc: Richard A. Farrier, Jr., Esq.
Jeremy Feigelson, Esq.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

TRADEMARK PROPERTIES, INC., a)	Civil Action No. 2:06-cv-2195-CWH
South Carolina corporation; RICHARD C.)	
DAVIS, an individual,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
A&E TELEVISION NETWORKS, and)	
MAX WEISSMAN PRODUCTIONS,)	
INC. d/b/a DEPARTURE FILMS,)	
)	
Defendants.)	
_____)	
)	
A&E TELEVISION NETWORKS,)	
)	
Counterclaim Plaintiff,)	
)	
vs.)	
)	
TRADEMARK PROPERTIES, INC. and)	
RICHARD C. DAVIS,)	
)	
Counterclaim Defendants.)	
)	
)	

NOTICE OF DEPOSITION OF MARK HALLORAN

TO: Mark Halloran
c/o Frank M. Cisa, Esq.
Cisa & Dodds, LLP
858 Lowcountry Boulevard, Suite 101
Mt. Pleasant, SC 29464

PLEASE TAKE NOTICE that on January 31, 2008, commencing at 9 a.m. at the offices of Sidley Austin LLP, 555 West Fifth Street, Los Angeles, California 90013, defendant and counterclaimant A&E Television Networks and defendant Max Weissman Productions, Inc. d/b/a Departure Films shall take the deposition of Mark Halloran, an expert witness retained by the plaintiffs.

The deposition will take place upon oral examination pursuant to the Federal Rules of Civil Procedure before an officer authorized by law to administer oaths or any other authorized person. The deposition will be recorded by stenographic and video means. Counsel is invited to attend and cross-examine.

NELSON MULLINS RILEY & SCARBOROUGH
LLP

By: 

Richard A. Farrier, Jr. (Fed. #772)

Robert H. Jordan (Fed. #6986)

Liberty Building, Suite 600

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Charleston, SC 29401

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Of Counsel:

Bruce P. Keller

Jeremy Feigelson

S. Zev Parnass

DEBEVOISE & PLIMPTON LLP

919 Third Avenue

New York, New York 10022

(212) 909-6000

Admitted Pro Hac Vice

*Attorneys for Defendant/Counterclaimant A&E
Television Networks and Defendant Max Weissman
Productions, Inc. d/b/a Departure Films*

January 10, 2008

Charleston, South Carolina

CERTIFICATE OF SERVICE

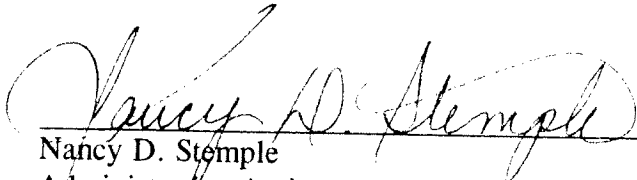
I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Defendants A&E Television Networks ("AETN") and Max Weissman Productions, Inc. d/b/a Departure Films ("Departure Films"), do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified via electronic mail and by having a copy hand delivered to the following address(es):

Pleadings:

NOTICE OF DEPOSITION OF MARK HALLORAN

Counsel Served:

Frank Cisa, Esquire
Cisa & Dodds, LLP
858 Lowcountry Blvd., Suite 101
Mt. Pleasant, SC 29464



Nancy D. Stemple
Administrative Assistant

Jan 10, 2008

Subpoena in a Civil Case

Issued by the UNITED STATES DISTRICT COURT

CENTRAL

DISTRICT OF

CALIFORNIA

TRADEMARK PROPERTIES, INC. et al.

V.

A&E TELEVISION NETWORKS, et al.

SUBPOENA IN A CIVIL CASE

Case Number: 2:06-cv-2195-CWH (D.S.C.)

TO: Mark Halloran c/o Frank M. Cisa, Esq. Cisa & Dodds, LLP 858 Lowcountry Boulevard, Suite 101 Mt. Pleasant, SC 29464

YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY COURTROOM DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case. Testimony will be recorded by stenographic sound-and-visual sound means

PLACE OF DEPOSITION Sidley Austin LLP, 555 West Fifth Street, Los Angeles, California 90013 DATE AND TIME 1/31/2008 9:00 am

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects and indicate the form of production): See Exhibit A, attached hereto.

PLACE Nelson Mullins Riley & Scarborough, LLP, 151 Meeting Street, Suite 600, Charleston, SC 29401 ATTN: Robert H. Jordan DATE AND TIME 1/22/2008 5:00 pm

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT DATE 1/10/2008

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER Robert H. Jordan, Nelson Mullins Riley & Scarborough LLP, 151 Meeting Street/Sixth Floor, P.O. Box 1806 (29402), Charleston, SC 29401-2239, (843) 853-5200

See Rule 45, Federal Rules of Civil Procedure, Subpoenas, (a), (d), and (e), on next page.

If action is pending in district other than district of issuance, state district under case number.

Subpoena in a Civil Case

PROOF OF SERVICE

DATE

PLACE

SERVED

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Subdivisions (c), (d), and (e), as amended on December 1, 2006:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection, copying, testing, or sampling of designated electronically stored information, books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection, copying, testing, or sampling may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to producing any or all of the designated materials or inspection of the premises or to producing electronically stored information in the form or forms requested. If objection is made, the party serving the subpoena shall not be entitled to inspect, copy, test, or sample the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production, inspection, copying, testing, or sampling. Such an order to compel shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection, copying, testing, or sampling commanded.

(3) A. On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if:

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provision of clauses (c)(3)(B)(i) of this rule, such a person may, in order to attend trial, be commanded to travel from any such place within the state in which the trial is held;

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies; or

(iv) subjects a person to undue burden.

B. If a subpoena

(1) requires disclosure of made secret or other confidential research, development, or commercial information; or

(2) requires disclosure of unretained expert's opinion or information and describing specific events or occurrences in dispute and relevant to the expert's study made for at the request of any party; or

(3) requires a person who is not a party or an officer of a party to incur substantial travel expenses more than 100 miles to attend trial, the court may, to protect a person subject

to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) (A) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(B) If a subpoena does not specify the form or forms for producing electronically stored information, a person responding to a subpoena must produce the information in a form or forms in which the person ordinarily maintains it or in a form or forms that are reasonably usable.

(C) A person responding to a subpoena need not produce the same electronically stored information in more than one form.

(D) A person responding to a subpoena need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or to quash, the person from whom discovery is sought must show that the information sought is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(c). The court may specify conditions for the discovery.

(2) (A) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial-preparation material, the claim shall be made expressly and shall be supported by a description of the nature of the document, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

(B) If information is produced in response to a subpoena that is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly inform, sequester, or destroy the specified information and any copies it has and may not use or disclose the information until the claim is resolved. A receiving party may promptly present the information to the court under seal for a determination of the claim. If the receiving party discloses the information before being notified, it must take reasonable steps to retrieve it. The person who produced the information must preserve the information until the claim is resolved.

(3) (A) Failure of any person with an adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court in which the subpoena is issued. An adequate excuse for failure to obey exists when a subpoena purports to require a company to attend or produce at a place not within the limits provided by clause (a) of subparagraph (3)(A).

EXHIBIT A

1. All contracts or other documents concerning the “numerous 50/50 joint venture agreements” that Mark Halloran asserts he has “negotiated and documented,” as stated in ¶ 1 of the Expert Witness Report;
2. The “Chronology of Events (undated)” listed at ¶ 3.6 of the Expert Witness Report;
3. All expert reports, affidavits, and transcripts of testimony that Mark Halloran has provided as an expert witness in connection with each of the seven lawsuits and arbitrations listed in Exhibit 2 of the Expert Witness Report;
4. All documents concerning Mark Halloran’s participation in the USC/BHBA Entertainment Law Institute panel, “Reality-Based Programming/Talk Shows/Clearances” in September 1997, including but not limited to prepared texts, transcripts, outlines and handwritten notes;
5. All documents concerning Mark Halloran’s lecture on “Creation and Protection of Rights in Film and TV” given at the UCLA Extension school in March 1998, including but not limited to prepared texts, transcripts, outlines and handwritten notes;
6. All documents concerning Mark Halloran’s lecture on “Creation and Protection of Rights in Film and TV” given at the UCLA Extension school in March 1999, including but not limited to prepared texts, transcripts, outlines and handwritten notes;
7. All documents concerning Mark Halloran’s lecture on “Creation and Protection of Rights in Film and TV” given at the UCLA Extension school in March 2000, including but not limited to prepared texts, transcripts, outlines and handwritten notes;
8. All documents containing or referring to any communications of any kind, including e-mails, between Mark Halloran and any person, including, without limitation, Plaintiffs or any attorneys or agents for Plaintiffs, relating to this litigation and/or the Expert Witness Report;
9. To the extent not covered in requests 1 through 8 above, all documents concerning any opinions that Mark Halloran has expressed or intends to express in this litigation with respect to damages, industry practice or any other issue, including without limitation articles, speeches, correspondence, contracts, analysis or workpapers, and documents generated or received by Mr. Halloran in connection with the representation of clients on matters that are relevant to the issues in this litigation.