

# LAW OFFICES OF KEITH S. KNOCHEL, P.C.

2135 Highway 95, Suite 241, Bullhead City, AZ 86442

(928) 444-1000

FACSIMILE: (928) 444-1015

Kingman

(928) 753-4357

Lake Havasu City

(928) 680-1181

Las Vegas

Professional Plaza  
2950 E. Flamingo,  
Suite B  
Las Vegas, NV 89121

[www.lawyersinaz.com](http://www.lawyersinaz.com)  
[law@lawyersinaz.com](mailto:law@lawyersinaz.com)

December 19, 2007

Christine Baker



**RE: Discovery Concerns – Baker v. United Online**

Dear Ms. Baker:

I am writing to address the discovery concerns within your letter dated December 12, 2007. I regret your saying you were ignored in your dealings with our firm, and this letter will hopefully begin resolving your concerns.

In regard to your second and sixth interrogatories, your request is reasonable and we will request this information from United Online as soon as possible, and then forward this information for your review. Regarding this litigation, only Kim Boothby is designated to speak on behalf of United Online in regard to this particular matter. In accordance with Rule 30(b) we ask for a minimum of ten days notice prior to the taking of Kim Boothby's deposition as well as compliance with all other relevant portions of this rule.

Listing myself as a defendant and employee was a clerical error on the verification as I am outside counsel for United Online, therefore, your taking of my deposition will not be necessary. The proper verifications are enclosed and we will immediately supplement our filings with the court.

In regard to party depositions I will ask Kim Boothby, who is designated to speak on behalf of the corporation, about dates in January which would be available. I would prefer to wait until January because we will then know the results of the pending motion for summary judgment. I do not feel the deposition of Anthony De Toro is necessary as when the discovery responses are corrected his name will be removed, and he would testify to substantially the same content as Ms. Boothby since they both work for United Online.

Neither my client United Online, or myself, would like to comment in your upcoming press release at this time, however, I appreciate you offering the chance to comment. If the firm and client's position change I will let you know.

Keith S. Knochel † • ♦

Aline K. Knochel †

\*\*\*\*\*

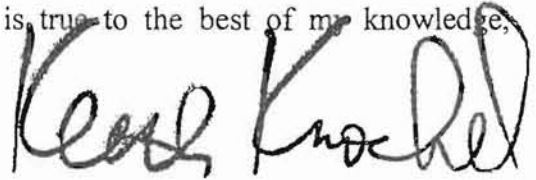
† Licensed in Arizona  
• Licensed in California  
♦ Licensed in Nevada

VERIFICATION

STATE OF )  
County of ) ss.

Keith Knochel, being first duly sworn, upon oath, deposes and says:

I am a Defendant in the above captioned action; I have read the foregoing Defendant's Initial Disclosure with Attachments, Response to Plaintiff, Christine Baker's, First Set of Requests for Admissions, know the contents thereof and the same is true to the best of my knowledge, information and belief.



Keith Knochel, Esq. for United Online

SUBSCRIBED AND SWORN to before me this 29 day of November 2007,  
by Keith Knochel.

My commission expires:

1-3-09

  
Notary Public