

Exhibit A



C L A R E L O C K E

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October 26, 2021

Via Personal Service

Mark E. Schamel
Lowenstein Sandler LLP
2200 Pennsylvania Avenue, N.W.
Washington, DC 20037

Re: *Fridman v. Bean LLC a/k/a Fusion GPS et al., No. 17-cv-2041 (D.D.C.)*

Dear Mark:

We write on behalf of our clients, Plaintiffs in the above-referenced matter, and in regard to the outstanding deposition and document subpoenas to your client, Igor Danchenko.

As you know, Plaintiffs filed a motion to compel Mr. Danchenko's compliance with the subpoenas in October 2020 [Dkt. 109], and Mr. Danchenko then moved to hold the motion to in abeyance on the grounds that he was not properly served [Dkt. 122]. In your papers, you represented to Plaintiffs and the Court that if Mr. Danchenko's motion was granted, you would, on Mr. Danchenko's behalf, "voluntarily accept service of Plaintiffs' Motion to Compel, pursuant to Fed. R. Civ. P. 5(b)(2)(F)." [Dkt. 122 at 1, n.1; Dkt. 122-1 at 3.] On September 30, 2021, the Court entered a Minute Order granting Mr. Danchenko's motion and directing that Plaintiffs' motion to compel be held in abeyance until such time as Mr. Danchenko has been served with a copy of the motion and given an opportunity to respond.

Accordingly, pursuant to Federal Rule of Civil Procedure 5(b), you are being personally served with the attached copies of Plaintiffs' Motion to Compel and Memorandum of Points and Authorities in Support of Plaintiffs' Motion to Compel Non-Party Igor Danchenko to Produce Documents. These are identical to the previously filed documents and, upon confirmation of service, Plaintiffs intend to file a notice with the Court renewing their motion to compel.

Sincerely,



Thomas A. Clare

Thomas A. Clare, P.C.

SR

Andrew C. Phillips