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Filing date: **09/07/2011**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	94002494
Party	Registrant Sports Entertainment, Inc. d/b/a Ivar's Sports Bar and Grill
Correspondence Address	RAYMOND R FERRERA ADAMS AND REESE LLP 1221 MCKINNEY, STE 4400 HOUSTON, TX 77010 UNITED STATES trademarks@arlaw.com
Submission	Motion for Sanctions
Filer's Name	Stephen R. Lewis
Filer's e-mail	stephen.lewis@arlaw.com, trademarks@arlaw.com
Signature	/Stephen R. Lewis/
Date	09/07/2011
Attachments	Sports Enterntainment - Motion for Sanctions.pdf (6 pages)(24009 bytes) Exhib001.PDF (12 pages)(363209 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the matter of: Trademark Application Serial No. 76/644,412
Filing Date: August 8, 2005
Mark: WHERE THE BEAUTIFUL PEOPLE COME TO GET UGLY
Applicant: The Dream Team, LLC

THE DREAM TEAM, LLC
Applicant

V.

CONCURRENT USE NO.: 94002494

SPORTS ENTERTAINMENT, INC.
D/B/A
IVAR'S SPORTS BAR AND GRILL
Defendant

**MOTION FOR SANCTIONS,
OR ALTERNATIVELY, TO COMPEL DISCOVERY CONFERENCE**

Pursuant to 37 C.F.R. §2.120(g)(1) and Federal Rule of Civil Procedure 37(b)(2), Defendant, Sports Entertainment, Inc., through its counsel, hereby requests an order of this Board dismissing this Concurrent Use Proceeding or, in the alternative, requiring Applicant, The Dream Team, LLC, to participate in the Discovery Conference as required by 37 C.F.R. §2.120(a) and the Board's Institution Order dated March 12, 2011. In support of this Motion, Defendant sets forth the following:

I. FACTS

Applicant caused this Concurrent Use Proceeding to be initiated against Defendant on March 12, 2011. On that same date, the Board issued an Institution Order setting the deadline for Defendant submit an Answer to the Concurrent Use Proceedings, as well as, setting a May 21, 2011 deadline for the opening of the discovery period and the occurrence of the Discovery Conference. Defendant timely filed its Answer on April 21, 2011.

Immediately thereafter, Defendant's counsel attempted in good faith on numerous

occasions to contact the Applicant by telephone. On each attempt, Defendant's counsel left a voice message requesting a return call from the Applicant for the purpose of discussing and scheduling the required Discovery Conference. On May 20, 2011, Defendant's counsel sent to Applicant a letter stating that Defendant intended to file a Motion for Sanctions against Applicant if it did not receive a response from Applicant on or before May 27, 2011. *See **Exhibit A***.

On May 27, 2011, Defendant received E-mail correspondence from Mr. Brady Cobb stating that he had been retained as counsel for Applicant and would be available to discuss scheduling deadlines and a possible resolution of the matter. On the same date, Defendant's counsel and Applicant's counsel discussed a possible resolution of the matter by telephone, but did not discuss any matters of discovery.

On June 3, 2011, believing that a settlement had been reached in the matter, Defendant's counsel provided to Applicant's counsel a draft Settlement Agreement for review and, if acceptable, execution by Applicant.

On June 21, 2011, Defendant, having received no word from Applicant regarding the Settlement Agreement or any discovery matters, sent E-mail correspondence to Applicant requesting the status of Applicant's position regarding the proposed settlement and Applicant's consent to file a Motion for Suspension, since the deadline for Initial Disclosures lapsed on June 20, 2011. Applicant granted consent for the Motion for Suspension on June 22, 2011.

The Consented Motion for Suspension of Proceedings was filed on June 22, 2011. On July 19, 2011, the Board issued an order denying Defendant's Motion for Suspension, but resetting the deadline for, *inter alia*, the opening of the discovery period to August 19, 2011 and the deadline for initial disclosures to September 18, 2011.

From the period of time beginning on June 22 through August 19, 2011, Defendant's

counsel attempted in good faith to contact Applicant's counsel, Mr. Brady Cobb, by telephone and E-mail correspondence on at least seven occasions to discuss the scheduling of the Discovery Conference prior to the August 19, 2011 deadline, or in the alternative, settlement of the concurrent use proceeding. A copy of the corresponding E-mail chain is attached as **Exhibit B**. Notwithstanding, Applicant has failed to provide Defendant with any indication of a willingness to participate in the discovery process or even to prosecute its own concurrent use proceeding.

On August 25, 2011, Defendant's counsel sent to Applicant's counsel E-mail correspondence informing Applicant that Defendant would file a Motion for Sanctions requesting dismissal of the matter if no response was received regarding the Discovery Conference. On the same date, Applicant's counsel responded by stating that he would provide Applicant with a response regarding the discovery matters no later than Monday, August 29, 2011. Notwithstanding, as of the date of this Motion for Sanctions, Applicant has failed to provide Defendant with any indication that it will participate in a discovery conference or in the discovery process.

II. AUTHORITY & ARGUMENTS

Trademark Rule 2.120(g) provides, in pertinent part, "if a party fails to participate in the required discovery conference . . . the Board may make any appropriate order, including those provided in Rule 37(b)(2) of the Federal Rules of Civil Procedure." 37 C.F.R. 2.120(g); *see also Kairos Institute of Sound Healing, LLC v. Doolittle Gardens, LLC*, Opp. No. 91181945, 2008 TTAB LEXIS 61, at *5 n.4 (TTAB 2008) (stating that "when a party fails to participate in the required discovery conference, an adverse party may move for entry of sanctions under Trademark Rule 2.120(g)(1) even in the absence of a Board order compelling participation"). Federal Rule of Civil Procedure 37(b)(2) states that if a party fails to obey an order to provide or

permit discovery, including an order under Rule 26(f), the court may issue just orders, including “dismissing the action or proceeding in whole or in part.” Fed. R. Civ. Pro. 37(b)(2)(A)(v).

The initial deadline for Applicant and Defendant to conduct a discovery conference was May 20, 2011. Defendant made numerous attempts to schedule a discovery conference with Applicant prior to the May 20, 2011 deadline; however, Applicant failed to respond to Defendant and exercise its mutual obligation to work with Defendant in scheduling a discovery conference prior to such date. Since the deadline for the opening of the discovery period and the discovery conference was reset for August 19, 2011, Defendant has again made numerous attempts to schedule a discovery conference with Applicant to discuss discovery matters; however, Applicant has failed to make any effort or provide any indication that it will participate in a discovery conference or in the discovery process.

Applicant’s failure to comply with the Board’s Institution Order regarding the discovery conference has already resulted in significant delay, has required Defendant to waste a substantial amount of time, money and effort to obtain Applicant’s cooperation in the discovery process, and has left Defendant unable to prepare for discovery in the matter. Accordingly, Defendant requests that the Board dismiss Applicant’s case with prejudice pursuant to Federal Rule of Civil Procedure 37(b)(2)(A)(v). In the alternative, Defendant requests that the Board enter an order compelling Applicant to participate in a discovery conference with Defendant.

III. CONCLUSION

Defendant hereby respectfully requests and prays, pursuant to 37 C.F.R. §2.120(g) and Federal Rule of Civil Procedure 37(b)(2)(A)(v), that the Board grant Defendant’s Motion for Sanctions, dismiss this Concurrent Use Proceeding with prejudice, and provide Defendant with any and all further relief to which it may be entitled. In the alternative, Defendant hereby respectfully requests and prays that the Board enter an order compelling Applicant to participate

in a discovery conference with Defendant and for any and all further relieve to which Defendant may be entitled.

Respectfully submitted,

ADAMS AND REESE, LLP

Date: September 7, 2011

/Stephen R. Lewis/

Raymond R. Ferrera
TX Bar No.: 00796541
Stephen R. Lewis
TX Bar No.: 24060169
Adams and Reese LLP
1221 McKinney, Suite 4400
Houston, Texas 77010
Phone: (713) 651-5151
Facsimile: (713) 651-5152
trademarks@arlaw.com
Attorneys for Defendant

CERTIFICATION

I certify that Defendant, the movant of this Motion for Sanctions, has in good faith attempted to confer with the Applicant to resolve the dispute without the necessity of Board intervention and such effort has failed.

/Stephen R. Lewis/
Stephen R. Lewis

CERTIFICATE OF SERVICE (pursuant to 37 C.F.R § 2.119)

I hereby certify that a copy of the foregoing CONSENTED MOTION FOR SUSPENSION was transmitted by U. S. Postal service first-class mail, postage prepaid, on this 7th day of September, 2011 to Applicant at the following addresses:

The Dream Team, LLC
1216 Washington Avenue
Miami Beach, Florida 33139

Brady Cobb
110 SE Sixth Street, Suite 1500
Fort Lauderdale, FL 33301
E-Mail: bjc@trippscott.com

/Stephen R. Lewis/
Stephen R. Lewis

ADAMS AND REESE LLP

May 20, 2011

Certified Article Number

7160 3901 9849 0352 8223

SENDER'S RECORD

The Dream Team, LLC
1216 Washington Ave.
Miami Beach, Florida 33139

Attorneys at Law

Alabama
Florida
Louisiana
Mississippi
Tennessee
Texas
Washington, DC

Stephen R. Lewis

Direct: 713.308.0103

E-Fax: 713.308.4017

stephen.lewis@arlaw.com

**VIA CERTIFIED MAIL RETURN RECEIPT
CONFIRMATION VIA FIRST CLASS MAIL**

Re: Concurrent Use Proceeding No. 94002494; The Dream Team, LLC vs. Sports Entertainment, Inc. d/b/a Ivar's Sports Bar and Grill; In the USPTO before the Trademark Trial and Appeal Board
Our Ref No. 4406-3

Dear Sirs:

As you are aware, we represent Sports Entertainment, Inc. ("SEI") in connection with the above-referenced concurrent use proceeding, which was initiated at your request.

On March 12, 2011, the Trademark Trial and Appeal Board ("TTAB") issued a scheduling order addressed to both The Dream Team, LLC and SEI that, *inter alia*, imposed a mutual duty on each party to meet and work together no later than May 21, 2011 in a "Discovery Conference" for the purpose of creating guidelines for appropriate discovery in this matter.

In furtherance of the TTAB's scheduling order, we have attempted on several occasions to contact The Dream Team *via* telephone to facilitate a Discovery Conference. On each occasion we have left voice messages requesting a return call from a representative of The Dream Team to discuss discovery in this matter. Notwithstanding, we have received no return call or contact of any kind from any representative of The Dream Team.

Therefore, if The Dream Team fails to contact me *via* telephone or E-mail by **March 27, 2011** we will file with TTAB a Request for Sanctions and, further, a Request for Dismissal of the above-referenced matter.

We look forward to your prompt reply.

Very truly yours,

ADAMS AND REESE LLP

Stephen R. Lewis

Stephen Lewis

From: Stephen Lewis
Sent: Thursday, August 25, 2011 12:46 PM
To: 'Brady Cobb'
Cc: Hong Do; Ray Ferrera
Subject: RE: The Dream Team, LLC v. Sports Entertainment, Inc. - August 19, 2011 Discovery Conference Deadline

Dear Mr. Cobb,

Thank you for the below E-mail. In view of your circumstances, we will wait until 5:00 pm CST on Monday, August 29, 2011 to hear a final word from you regarding the discovery conference, before we file a Motion to Dismiss the matter.

Sincerely,

Stephen R. Lewis, Esq.
Adams and Reese LLP
One Houston Center
1221 McKinney, Suite 4400
Houston, Texas 77010
Main: (713) 652-5151
Direct: (713) 308-0103
Fax: (713) 652-5152
Stephen.Lewis@arlaw.com
www.adamsandreeese.com

From: Brady Cobb [<mailto:bjc@TrippScott.com>]
Sent: Thursday, August 25, 2011 12:42 PM
To: Stephen Lewis
Cc: Hong Do; Ray Ferrera
Subject: RE: The Dream Team, LLC v. Sports Entertainment, Inc. - August 19, 2011 Discovery Conference Deadline

Stephen:

I apologize for the delay in getting back to you. I have been attempting to contact my client and have not been able to. If I cannot, I will have to withdraw from representing him. I will let you know by Monday if that is ok, please advise.



110 SE Sixth Street, Suite 1500
Fort Lauderdale, FL 33301
954-525-7500

9/7/2011



Brady Cobb

Attorney

Direct: (954) 760-4939

Fax: (954) 761-8475

bjc@trippscott.com

From: Stephen Lewis [mailto:Stephen.Lewis@arlaw.com]
Sent: Thursday, August 25, 2011 1:19 PM
To: Brady Cobb
Cc: Hong Do; Ray Ferrera
Subject: RE: The Dream Team, LLC v. Sports Entertainment, Inc. - August 19, 2011 Discovery Conference Deadline

Dear Mr. Cobb,

In furtherance of previous correspondence, we wish to inform you that if we do not receive a response from you regarding the discovery conference in the above-referenced matter by 5:00 p.m. CST **Friday, August 26, 2011** we will file a motion with the Trademark Trial and Appeal Board requesting dismissal of the concurrent use proceeding and the entry of a default judgment.

Sincerely,

Stephen R. Lewis, Esq.
Adams and Reese LLP
One Houston Center
1221 McKinney, Suite 4400
Houston, Texas 77010
Main: (713) 652-5151
Direct: (713) 308-0103
Fax: (713) 652-5152
Stephen.Lewis@arlaw.com
www.adamsandree.com

From: Stephen Lewis
Sent: Friday, August 19, 2011 5:42 PM
To: 'Brady Cobb'
Cc: Hong Do
Subject: RE: The Dream Team, LLC v. Sports Entertainment, Inc. - August 19, 2011 Discovery Conference Deadline

Dear Mr. Cobb,

As you are aware, today was the deadline for conducting a discovery conference in the above-referenced Concurrent Use Proceeding that was initiated by your client, The Dream Team, LLC ("TDT").

However, it appears that we will not be conducting the discovery conference today, because you have not returned any of the telephone calls or E-mails I have made or directed to you to schedule the discovery

9/7/2011

conference. In fact, I have now attempted to contact you both by telephone and by E-mail several times regarding the status of settlement discussions in the case, as well as, the discovery conference, yet have received no response since June 22, 2011 (almost two months ago).

My Client, Sports Entertainment, Inc ("SEI") has already expended money on one occasion to extend the deadlines in the matter that TDT initiated, due to a lack of response or prosecution on the part of TDT, and will not continue to expend money to carry TDT's burden to prosecute its own case.

In addition, we note that SEI has proposed to TDT (and incurred the expense of drafting) a very generous and reasonable settlement offer, that would grant to TDT more rights than afforded to TDT under trademark law. In fact, SEI revised the settlement offer to accommodate additional requests made on behalf of TDT, expanding the authorized territory wherein TDT may use its mark.

However, if your client does not agree to the settlement offer prior to SEI's expenditure of funds to conduct discovery, then SEI will revoke the offer and defend its trademark rights in the concurrent use proceeding.

We look forward to your response.

Sincerely,

Stephen R. Lewis, Esq.
Adams and Reese LLP
One Houston Center
1221 McKinney, Suite 4400
Houston, Texas 77010
Main: (713) 652-5151
Direct: (713) 308-0103
Fax: (713) 652-5152
Stephen.Lewis@arlaw.com
www.adamsandreese.com

From: Stephen Lewis
Sent: Friday, August 12, 2011 10:52 AM
To: Brady Cobb
Cc: Hong Do
Subject: The Dream Team, LLC v. Sports Entertainment, LLC - August 19, 2011 Discovery Conference Deadline
Importance: High

Brady,

As you are aware, the deadline for conducting a discovery conference in the above-referenced matter is August 19, 2011. Please let me know your availability next week. Since you are out of the office until Tuesday, it may be good to schedule a teleconference for Thursday or Friday of next week.

Sincerely,

Stephen R. Lewis, Esq.
Adams and Reese LLP
One Houston Center
1221 McKinney, Suite 4400
Houston, Texas 77010
Main: (713) 652-5151
Direct: (713) 308-0103
Fax: (713) 652-5152

9/7/2011

Stephen.Lewis@arlaw.com
www.adamsandreese.com

From: Stephen Lewis
Sent: Monday, July 25, 2011 1:41 PM
To: 'Brady Cobb'
Cc: Hong Do
Subject: FW: The Dream Team, LLC v. Sports Entertainment, LLC
Importance: High

Brady,

The US Trademark Trial and Appeal Board has rejected our consented request for an extension of time, however, has extended the deadlines to facilitate the discovery necessary to conduct the proceedings. In case you have not received the order resetting the deadlines, I have attached hereto.

Accordingly, we need to set a time prior to August 19, 2011 to conduct the initial discovery conference. Please let me know your availability. I am available the week of the August 8-12.

I have also attached hereto a copy of the Settlement Agreement containing the terms of settlement we discussed on June 3, 2011.

I look forward to your response.

Sincerely,

Stephen R. Lewis, Esq.
Adams and Reese LLP
One Houston Center
1221 McKinney, Suite 4400
Houston, Texas 77010
Main: (713) 652-5151
Direct: (713) 308-0103
Fax: (713) 652-5152
Stephen.Lewis@arlaw.com
www.adamsandreese.com

From: Stephen Lewis
Sent: Friday, July 22, 2011 10:34 AM
To: 'Brady Cobb'
Cc: Hong Do
Subject: FW: The Dream Team, LLC v. Sports Entertainment, LLC
Importance: High

Brady,

In furtherance of the below E-mail and the phone message I left you today, has your client had the opportunity to review the attached Settlement Agreement? Please let me know where you stand.

Sincerely,

9/7/2011

Stephen R. Lewis, Esq.
Adams and Reese LLP
One Houston Center
1221 McKinney, Suite 4400
Houston, Texas 77010
Main: (713) 652-5151
Direct: (713) 308-0103
Fax: (713) 652-5152
Stephen.Lewis@arlaw.com
www.adamsandreeese.com

From: Stephen Lewis
Sent: Friday, July 08, 2011 4:24 PM
To: 'Brady Cobb'
Cc: Hong Do
Subject: FW: The Dream Team, LLC v. Sports Entertainment, LLC
Importance: High

Brady,

Has your client had the opportunity to review the attached Settlement Agreement? Please let me know where you stand.

Sincerely,

Stephen R. Lewis, Esq.
Adams and Reese LLP
One Houston Center
1221 McKinney, Suite 4400
Houston, Texas 77010
Main: (713) 652-5151
Direct: (713) 308-0103
Fax: (713) 652-5152
Stephen.Lewis@arlaw.com
www.adamsandreeese.com

From: Stephen Lewis
Sent: Wednesday, June 29, 2011 1:11 PM
To: 'Brady Cobb'
Cc: Hong Do
Subject: RE: The Dream Team, LLC v. Sports Entertainment, LLC

Brady,

Has your client had the opportunity to review the attached Settlement Agreement? Please let me know where you stand.

Sincerely,

9/7/2011

Stephen R. Lewis, Esq.
Adams and Reese LLP
One Houston Center
1221 McKinney, Suite 4400
Houston, Texas 77010
Main: (713) 652-5151
Direct: (713) 308-0103
Fax: (713) 652-5152
Stephen.Lewis@arlaw.com
www.adamsandree.com

From: Brady Cobb [<mailto:bjc@TrippScott.com>]
Sent: Wednesday, June 22, 2011 5:42 AM
To: Stephen Lewis
Cc: Hong Do
Subject: RE: The Dream Team, LLC v. Sports Entertainment, LLC

I agree with that, thanks!



110 SE Sixth Street, Suite 1500
Fort Lauderdale, FL 33301
954-525-7500

Brady Cobb

Attorney

Direct: (954) 760-4939
Fax: (954) 761-8475
bjc@trippscott.com

From: Stephen Lewis [<mailto:Stephen.Lewis@arlaw.com>]
Sent: Tuesday, June 21, 2011 11:42 AM
To: Brady Cobb
Cc: Hong Do
Subject: RE: The Dream Team, LLC v. Sports Entertainment, LLC

Brady,

Will you consent to a joint Motion for Suspension of the proceedings for the purposes of negotiation? Since we are in talks to settle the matter, we need to suspend the proceeding and discovery deadlines.

Please let me know if this is acceptable to you and I will prepare and file the motion with TTAB.

Sincerely,

Stephen R. Lewis, Esq.

9/7/2011

Adams and Reese LLP
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1221 McKinney, Suite 4400
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Fax: (713) 652-5152
Stephen.Lewis@arlaw.com
www.adamsandreeese.com

From: Stephen Lewis
Sent: Tuesday, June 21, 2011 9:51 AM
To: 'Brady Cobb'
Cc: Hong Do
Subject: RE: The Dream Team, LLC v. Sports Entertainment, LLC

Brady,

In furtherance of the below E-mail, have you had an opportunity to review the proposed Concurrent Use Agreement? The deadline for initial disclosures was yesterday. If we are not going to be able to settle this matter, we need to conduct discovery.

Please let me know where you and your client stand in regard to these proceedings.

Sincerely,

Stephen R. Lewis, Esq.
Adams and Reese LLP
One Houston Center
1221 McKinney, Suite 4400
Houston, Texas 77010
Main: (713) 652-5151
Direct: (713) 308-0103
Fax: (713) 652-5152
Stephen.Lewis@arlaw.com
www.adamsandreeese.com

From: Brady Cobb [<mailto:bjc@TrippScott.com>]
Sent: Monday, June 06, 2011 10:43 AM
To: Stephen Lewis
Cc: Hong Do
Subject: RE: The Dream Team, LLC v. Sports Entertainment, LLC

Stephen:

I apologize for the delayed response, I was out of the office Thursday afternoon and Friday. I will get back to you shortly, thanks for your patience.

9/7/2011



110 SE Sixth Street, Suite 1500
Fort Lauderdale, FL 33301
954-525-7500

Brady Cobb

Attorney

Direct: (954) 760-4939
Fax: (954) 761-8475
bjc@trippscott.com

From: Stephen Lewis [mailto:Stephen.Lewis@arlaw.com]
Sent: Friday, June 03, 2011 5:33 PM
To: Brady Cobb
Cc: Hong Do
Subject: RE: The Dream Team, LLC v. Sports Entertainment, LLC

Brady,

The Settlement Agreement I sent you omitted the State of South Carolina and Las Vegas. The attached Concurrent Use Agreement contemplates the expanded Dream Team Territory.

Please let me know if you have any questions.

Sincerely,

Stephen R. Lewis, Esq.
Adams and Reese LLP
One Houston Center
1221 McKinney, Suite 4400
Houston, Texas 77010
Main: (713) 652-5151
Direct: (713) 308-0103
Fax: (713) 652-5152
Stephen.Lewis@arlaw.com
www.adamsandreeselaw.com

From: Stephen Lewis
Sent: Friday, June 03, 2011 4:21 PM
To: 'Brady Cobb'
Cc: Hong Do
Subject: RE: The Dream Team, LLC v. Sports Entertainment, LLC

Brady,

In furtherance of the below E-mail, I have drafted a Settlement Agreement for your review and execution by the

9/7/2011

parties. Please let me know if you have any comments.

Sincerely,

Stephen R. Lewis, Esq.
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1221 McKinney, Suite 4400
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Stephen.Lewis@arlaw.com
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From: Stephen Lewis
Sent: Tuesday, May 31, 2011 6:36 PM
To: 'Brady Cobb'
Cc: Hong Do
Subject: RE: The Dream Team, LLC v. Sports Entertainment, LLC

Brady,

I appreciate your time this afternoon.

I spoke further with my Client regarding the newly proposed settlement offer of a Dream Team territory including the state of Florida, the state of South Carolina and the city of Las Vegas, Nevada. He is willing to agree to the enlarged territory to settle the matter now, so long as he can sell clothing with the mark WHERE BEAUTIFUL PEOPLE COME TO GET UGLY throughout the United States.

Please let me know if this is agreeable to your client. Once I receive your confirmation I will draft up the Settlement Agreement.

Sincerely,

Stephen R. Lewis, Esq.
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Direct: (713) 308-0103
Fax: (713) 652-5152
Stephen.Lewis@arlaw.com
www.adamsandreese.com

From: Brady Cobb [<mailto:bjc@TrippScott.com>]
Sent: Friday, May 27, 2011 8:45 AM
To: Stephen Lewis
Subject: The Dream Team, LLC v. Sports Entertainment, LLC

Stephen:

9/7/2011

I am being retained as counsel for the Dream Team, LLC and my client has forwarded me your letter dated May 20, 2011 regarding the scheduling conference. Please give me a call to discuss the scheduling deadlines and the possible resolution of this matter. My contact information is below. Thanks.



110 SE Sixth Street, Suite 1500
Fort Lauderdale, FL 33301
954-525-7500

Brady Cobb

Attorney

Direct: (954) 760-4939
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9/7/2011

such statements relate.