

# Exhibit 1

**From:** [Vickery, Logan](#)  
**To:** [Feldstein, Robyn](#); [Delgado, Jennifer Fiorica](#)  
**Cc:** [Cremona, Nicholas J.](#); [Bordner, Alexa T.](#); [Fulfree, Nicole](#); [Ashley, Stephanie](#); [Shifrin, Maximillian S.](#); [Huse, Jessica A.](#)  
**Subject:** RE: Picard v. Bureau of Labor Insurance; 11-02732  
**Date:** Thursday, May 5, 2022 4:22:21 PM  
**Attachments:** [image001.jpg](#)  
[image002.jpg](#)  
[image003.jpg](#)  
[image004.jpg](#)

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Robyn,

Thank you for your flexibility. We understood today's meeting to be a placeholder to resolve any issues with the Case Management Order and the Amended Answer, but due to the reorganization within the Taiwanese government that we detailed to you on April 29, 2022, we have had to seek a wider set of approvals than we originally anticipated for the pleading and for the Case Management Order. We are actively working through this situation with our client and making every effort to move things along as fast as possible.

This notwithstanding, regarding your comments to the last draft of the amended answer, we are accepting of all, although we have made a few more revisions. We will provide you with this latest (and hopefully final) draft by end of day tomorrow, but it will be subject to final client approval given the process described above. Additionally, we will provide you with our comments on the Case Management Order by tomorrow evening, also subject to final client approval.

As for your email last night, we believe this situation should be resolved through a substitution of the defendant rather than an addition. We are also considering whether it is the Labor Insurance Fund, rather than BLF, that is the proper defendant. We would like to discuss this with you and your team when we meet next week. In the meantime, let us know if there is any information we can provide that will aid in that discussion.

We are available to meet next Tuesday from 2:30pm-4:00pm, or Wednesday 10:00am-3:00pm.

Best,

Logan

**Logan P. Vickery**

Associate

Lowenstein Sandler LLP

**T:** 862.926.2299

**M:** 501.230.0163

**F:** 973.597.2400

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**From:** Feldstein, Robyn

**Sent:** Thursday, May 5, 2022 10:49 AM

**To:** Vickery, Logan ; Delgado, Jennifer Fiorica

**Cc:** Cremona, Nicholas J. ; Bordner, Alexa T. ; Fulfree, Nicole ; Ashley, Stephanie ; Shifrin, Maximillian S. ; Huse, Jessica A.

**Subject:** RE: Picard v. Bureau of Labor Insurance; 11-02732

Hi Logan,

We are amenable to rescheduling the Rule 26(f) conference to early next week, but if we cannot come to an agreement on these open issues by the end of next week we will be

seeking a conference with the court. We have been more than accommodating of the difficulties of coordinating with your client and have rescheduled our meetings on short notice on more than one occasion; however, we cannot let this extend on indefinitely. It has been over six months since we first started discussions and we need to commence discovery consistent with the court's direction.

Please let us know your availability for a call on Monday or Tuesday of next week. In the meantime, we have a number of outstanding items we should be able to address by email: (i) please provide a response to my email regarding your request to add BLF as a party; (ii) provide a response to our comments to the revised amended answer that we sent to you on April 12, 2022; and (iii) provide comments to the proposed Case Management Order that we sent to you on April 28, 2022.

Best,  
Robyn

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**From:** Vickery, Logan <[LVickery@lowenstein.com](mailto:LVickery@lowenstein.com)>

**Sent:** Thursday, May 05, 2022 9:47 AM

**To:** Feldstein, Robyn <[rfeldstein@bakerlaw.com](mailto:rfeldstein@bakerlaw.com)>; Delgado, Jennifer Fiorica <[JDelgado@lowenstein.com](mailto:JDelgado@lowenstein.com)>

**Cc:** Cremona, Nicholas J. <[ncremona@bakerlaw.com](mailto:ncremona@bakerlaw.com)>; Bordner, Alexa T. <[abordner@bakerlaw.com](mailto:abordner@bakerlaw.com)>; Fulfree, Nicole <[NFulfree@lowenstein.com](mailto:NFulfree@lowenstein.com)>; Ashley, Stephanie <[SAshley@lowenstein.com](mailto:SAshley@lowenstein.com)>; Shifrin, Maximillian S. <[mshifrin@bakerlaw.com](mailto:mshifrin@bakerlaw.com)>; Huse, Jessica A. <[jhuse@bakerlaw.com](mailto:jhuse@bakerlaw.com)>

**Subject:** RE: Picard v. Bureau of Labor Insurance; 11-02732

Dear Robyn,

We apologize for the late notice, but in light of the development we shared with you last week, we believe today's meet & confer should be pushed to the first half of next. We are still working to get client approval to share the latest pleading, and we have not yet been able to discuss the case management schedule with them.

Let us know if your team is amenable to postponing today's call till next Tuesday or Wednesday so that we may have a more substantive discussion.

Best,  
Logan

**Logan P. Vickery**

Associate

Lowenstein Sandler LLP

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**M:** 501.230.0163

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