



June 16, 2023

David Koenig
c/o attorney Marc Mohan
1525 SE 22nd Avenue
Portland, Oregon 97214
veritelawcompany@gmail.com

RE Case No. 23CV15424

On June 8, we sent plaintiff a letter requesting confirmation that he had provided all his documents that were responsive to our discovery requests.

Plaintiff did not respond.

Based on the facts as we now understand them, plaintiff either withheld or destroyed relevant responsive documents that were in his possession, including communications with Augustine Adda, John Chew, Judy Cole, Jason Idalski, Wayne Kelly, Eric Kinderman, Mina Le, Stefan Rau, Cesar del Solar, Sue Tremblay and others, as well as statements plaintiff has made about this lawsuit.

Please let us know your availability next Monday or Tuesday to confer.

Thank you.

Sincerely,

s/ Michael Fuller
Partner

US Bancorp Tower • 111 SW 5th Ave. • Suite 3150
Portland, Oregon 97204 • 503-222-2000