

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

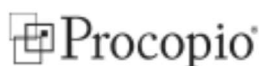
[REDACTED]

On Fri, Jun 4, 2021 at 3:27 PM Ferguson, Lisel M. <[REDACTED]> wrote:

Note you can't force the sale of a Primary Residence and there is a "homesteaders exemption" of a certain amount in CA when the property is sold.

LISEL M. FERGUSON
PARTNER

P. 619.515.3207 | F. 619.744.5407 | [REDACTED]
[525 B STREET, SUITE 2200, SAN DIEGO, CA 92101](#)
[View Profile](#) | [LinkedIn](#) | [procopio.com](#)



From: Ferguson, Lisel M.
Sent: Friday, June 4, 2021 3:13 PM
To: 'Katherine McNamara' <[REDACTED]>
Cc: Jeremy Whiteley <[REDACTED]>; Proctor, Greta A. <[REDACTED]>; Fuger, Michele L. <[REDACTED]>
Subject: RE: Chelsea's Requests and BCS' Position

Hi Katherine,

See my responses below in green.

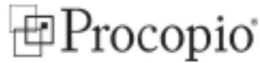
Sincerely,

Lisel

LISEL M. FERGUSON

PARTNER

P. 619.515.3207 | F. 619.744.5407 | [REDACTED]
525 B STREET, SUITE 2200, SAN DIEGO, CA 92101
[View Profile](#) | [LinkedIn](#) | [procopio.com](#)



From: Katherine McNamara <[REDACTED]>
Sent: Friday, June 4, 2021 2:12 PM
To: Ferguson, Lisel M. <[REDACTED]>
Cc: Jeremy Whiteley <[REDACTED]>; Proctor, Greta A. <[REDACTED]>
Subject: Re: Chelsea's Requests and BCS' Position

Sorry about the email issues. Our email provider is having some issues today and we're waiting for them to come back up.

I think we largely agree that this is a delay tactic or a way to get us to drop the suit.

I actually was saving up some questions for you this week from the team if you have a moment to review/answer, Lisel:

- Assuming we win a judgment, what are our options and prognosis for recovery? You prognosis to get back your social media accounts and get them to cease use of the mark Breaking Code Silence is very good. You may well get damages but the prognosis is not as good as these will be hard to prove-up and hard to collect. There is a potential for fees, however again collection will be hard.
- Would it be unethical or wrong to make the defendants aware of these options for recovery and that they might not be completely "judgment proof" as they believe they are or telling each other? They are not Judgement Proof
 - Tax returns You can ask for these in discovery
 - Spouse's paycheck garnished If you obtain a monetary judgment then you can garnish wages over a certain amount. Since we are in a community property State you would be able to garnish a spouse's paycheck over a certain amount (i.e. needed living expenses cannot be garnished)
 - Tax returned garnished same as above
 - Lien on houses ([REDACTED] all own) yes
 - Future paychecks when they get jobs ([REDACTED] all have to get jobs in the near term) yes

- What happens if one of them was served earlier than the rest? Do we have 30 days from the day the last one was served or we can default on them one-by-one if they don't respond? Each one has to respond within 21 days of being served personally. However if served through an attorney this is longer. I will send you the dates that each must respond by on Monday.
- What is the status of the settlement from [REDACTED] attorney? No last I heard was that he wanted an accounting of the \$15,000 we were demanding. This is a ridiculous request and I advised he needs to provide a counteroffer.
- How many other attorneys in your practice have snorted coffee out of their nose hearing stories about our case? 🤔

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

LISEL M. FERGUSON
PARTNER

P. 619.515.3207 | F. 619.744.5407 | [REDACTED]
525 B STREET, SUITE 2200, SAN DIEGO, CA 92101
[View Profile](#) | [LinkedIn](#) | [procopio.com](#)