

**Wright, Allie M.**

---

**From:** Wright, Allie M.  
**Sent:** Friday, November 12, 2010 12:49  
**To:** 'dhshapiro@swickandshapiro.com'  
**Cc:** Ward, Denise A.; McCally, Thomas L.; Wright, Allie M.  
**Subject:** Re: Consent motion

David,

This looks fine, having viewed it on my blackberry. Please go ahead and file.

Regarding your opposition, I remind you of the protective order entered in this case. I expect that you and your client will abide by the order when filing your opposition and supporting documents. Any deposition testimony, documents, or exhibits that have been marked confidential under to the protective order that you plan to attach to your motion should be filed under seal with the court, and your opposition should be redacted accordingly and/or filed under seal.

I appreciate your cooperation and compliance with the protective Order. I will send you a written letter reiterating this.

Regards,  
-Allie

---

Allie Wright  
Carr Maloney P.C.  
2000 L Street, NW  
Suite 450  
Washington, D.C. 20036  
(202) 310-5525  
(202) 310-5555 (fax)

This message is intended for the individual(s) or entity(ies) named in the header that appears either at the beginning or at the conclusion of all material in this message (depending on your email software). This message may contain material that is privileged or confidential. If you are not the intended recipient, please do not read, copy, use or disclose this communication to others; also please notify the sender by replying to this message, and then delete it from your system. Thank you.

---

**From:** David Shapiro <dhshapiro@swickandshapiro.com>  
**To:** Wright, Allie M.  
**Sent:** Fri Nov 12 12:33:33 2010  
**Subject:** Consent motion

Allie:

Here is the corrected version of the consent motion we just discussed by phone. It is a pdf file. As agreed, I will wait 15 minutes after sending it to you before I file it.

Thank you for your cooperation.

Very truly yours,

David H. Shapiro  
SWICK & SHAPIRO, P.C.  
1225 Eye Street, N.W.  
Suite 1290  
Washington, DC 20005  
Tel. 202-842-0300  
Fax 202-842-1418

# **EXHIBIT F**

## Wright, Allie M.

---

**From:** Wright, Allie M.  
**Sent:** Monday, November 15, 2010 18:55  
**To:** David Shapiro  
**Cc:** Wright, Allie M.; McCally, Thomas L.; Ward, Denise A.  
**Subject:** AIPAC/ROSEN

David,  
Per my email to you on Friday, Nov, 11, here is follow up correspondence.  
Regards,  
-Allie



11-15-10 Ltr to  
Shapiro re pro...

---

Allie M. Wright  
Carr Maloney P.C.  
2000 L Street, N.W.  
Suite 450  
Washington, DC 20036  
202-310-5500  
202-310-5555 (Fax)  
[AMW@carrmaloney.com](mailto:AMW@carrmaloney.com)  
<http://www.carrmaloney.com>

**Offices in Washington, DC | Maryland | Virginia**

**Please note our new Washington, DC address above, effective November 8, 2010. The phone and fax numbers remain the same.**

This message is intended for the individual(s) or entity(ies) named in the header that appears either at the beginning or at the conclusion of all material in this message (depending on your e-mail software). This message may contain material that is privileged or confidential. If you are not the intended recipient, please do not read, copy, use or disclose this communication to others; also please notify the sender by replying to this message, and then delete it from your system. Thank you

## Carr Maloney P.C.

2000 L Street, NW  
Suite 450  
Washington, DC 20036  
(202) 310-5500  
FAX (202) 310-5555  
[www.carrmaloney.com](http://www.carrmaloney.com)

Tycon Towers  
8000 Towers Crescent Drive  
Suite 1350  
Vienna, VA 22182  
(703) 691-8818

400 East Pratt Street  
8th Floor  
Baltimore, MD 21202

8120 Woodmont Avenue  
Suite 650  
Bethesda, MD 20814  
(301) 424-7024

**Allie M. Wright**  
**(202) 310-5525**

Admitted in DC & MD  
E-mail: [AMW@carrmaloney.com](mailto:AMW@carrmaloney.com)

November 15, 2010

### VIA EMAIL & FACSIMILE

Mr. David Shapiro, Esq.  
1225 Eye Street, NW  
Suite 1290  
Washington, DC 20005  
[dhshapiro@swickandshapiro.com](mailto:dhshapiro@swickandshapiro.com)

RE: AIPAC/ROSEN  
Our File No.: 07309DC001

Dear Mr. Shapiro:

This letter reaffirms my communication to you on Friday November 12, 2010. Again, I remind you of your obligations under the protective order when filing your opposition and supporting documents. Any deposition testimony, documents, or exhibits that have been marked or designated confidential pursuant to the protective order filed as an exhibit or attachment to your motion, should be filed under seal and your opposition brief redacted accordingly.

We reserve the right to seek sanctions and/or damages for any breach of the protective order, including but not limited to, not properly filing confidential, privileged, or proprietary documents under seal, and/or leaking documents designated under the protective order to the press.

We appreciate your anticipated cooperation and compliance with the protective order.

Sincerely,



Allie M. Wright

# EXHIBIT G

## Carr Maloney P.C.

2000 L Street, NW  
Suite 450  
Washington, DC 20036  
(202) 310-5500  
FAX (202) 310-5555  
[www.carrmaloney.com](http://www.carrmaloney.com)

Tycon Towers  
8000 Towers Crescent Drive  
Suite 1350  
Vienna, VA 22182  
(703) 691-8818

400 East Pratt Street  
8th Floor  
Baltimore, MD 21202

8120 Woodmont Avenue  
Suite 650  
Bethesda, MD 20814  
(301) 424-7024

**Thomas L. McCally**  
**(202) 310-5506**

Admitted in DC, MD and GA  
E-mail: [TLM@carrmaloney.com](mailto:TLM@carrmaloney.com)

**Allie M. Wright**  
**(202) 310-5525**

Admitted in DC & MD  
E-mail: [AMW@carrmaloney.com](mailto:AMW@carrmaloney.com)

December 16, 2010

### **VIA EMAIL & FAX (202-842-1418)**

Mr. David Shapiro, Esq.  
1225 Eye Street, NW, Suite 1290  
Washington, DC 20005  
[dhshapiro@swickandshapiro.com](mailto:dhshapiro@swickandshapiro.com)

RE: AIPAC/ROSEN  
Our File No.: 07309DC001

Dear Mr. Shapiro:

Various documents and exhibits filed with your Memorandum of Points and Authorities in Opposition to Defendants' Motion for Summary Judgment are in violation of the Protective Order entered on April 30, 2010.

Your Client Steven Rosen violated the AIPAC employee handbook by improperly taking confidential, privileged, and proprietary documents belonging to AIPAC. The return of those documents was requested verbally at numerous depositions and by letter dated May 14, 2010.<sup>1</sup> To date neither you nor your Client have returned any of the AIPAC documents.

The parties entered into a protective order to govern the disclosure and handling of confidential, privileged, and proprietary information disclosed in this litigation and your latest pleading is in violation of that Protective Order. Throughout discovery and at depositions, Defendants designated various documents attached to your Opposition memorandum as

---

<sup>1</sup> See May 14, 2010 Letter to David Shapiro.

David Shapiro, Esq.  
December 16, 2010  
Page 2 of 2

Confidential pursuant to the Protective Order, and Plaintiff never challenged the designations. This means the designation is in effect.

Pursuant to paragraph 10 of the Protective Order, any party filing confidential information as part of a motion shall file the document or paper *under seal*. You and your Client have violated this provision by intentionally filing documents and information marked confidential without placing them under seal, and by leaking documents designated under the protective order to the press. You and your Client have violated the Protective Order despite repeated communications from our Firm requesting your compliance, reiterating the expectation that you and your Client would abide by court rules and the Protective Order when filing your opposition and supporting documents.<sup>2</sup> You chose, however, to disregard Ms. Wright's communications and not respond.

It is clear from the inclusion of the materials covered by the Protective Order that your Client's intention is solely to try this case in the press and not in a court of law. Your willful and deliberate violation of the Protective Order, and unwillingness to abide by court rules, demonstrates your lack of respect for basic legal principles, court authority, and the doctrine of attorney-client privilege.

Accordingly, Defendants will be filing a motion seeking sanctions.

Sincerely,



Thomas L. McCally



Allie M. Wright

Enclosures

---

<sup>2</sup> See November 12, 2010, and November 15, 2010 emails from Ms. Allie Wright to David Shapiro.