

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

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SHABTAI SCOTT SHATSKY, *et al.*, )  
  )  
  )  
  Plaintiffs, )  
v.   ) Civil Action No. 1:02cv02280 (RJL)  
  )  
  )  
THE SYRIAN ARAB REPUBLIC, *et al.*, )  
  )  
  )  
  Defendants. )  
  )  
  )

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**DEFENDANTS' OPPOSITION TO PLAINTIFFS' "MOTION FOR A  
CONTINUANCE" OF THE JANUARY 18, 2013 STATUS CONFERENCE (DE 215)**

Defendants the Palestinian Authority ("PA") and the Palestine Liberation Organization ("PLO") (collectively, "Defendants"), by and through counsel, oppose Plaintiffs' motion for a continuance of the January 18, 2013 status conference the Court previously set by Minute Order dated January 2, 2013. The representations by Plaintiffs in their motion are implausible, the reasons they proffer do not justify a continuance and the scheduling needs which prompted the Court to schedule the status hearing in the first instance are even more acute, particularly given the attempt by one of Plaintiffs' counsel, David I. Schoen, Esq., to withdraw from this case for undisclosed reasons. Accordingly, Plaintiffs' motion for continuance should be denied.

**SUMMARY OF RELEVANT BACKGROUND**

On January 2, 2013, the Court entered a Minute Order denying the last of the discovery motions that Plaintiffs began filing three months ago. In the same Minute Order, the Court also granted Defendants' Motion for Return or Destruction of Inadvertently Produced Document ("Motion for Return") (DE 170), which required Plaintiffs to take various actions and to certify their compliance to the Court by January 9, 2013. Recognizing that the resolution of all

outstanding discovery motions implicated various scheduling issues, the Court set a status conference for January 18, 2013 at 11:00 a.m.

Shortly after the entry of the January 2, 2013 Minute Order, Defendants sent Plaintiffs an email reminding Plaintiffs of their obligations as a result of the Court's granting of Defendants' Motion for Return. *See Email from Charles F.B. McAleer, Jr. to Robert J. Tolchin* (January 4, 2013, 12:17 p.m.) (attached as Exhibit 1) ("Ex."). Plaintiffs did not respond until five days later, at 4:30 p.m. on the day they were required to comply with the Court's ruling. *See Email from David I. Schoen to Charles F. B. McAleer, Jr.* (January 9, 2013, 4:30 p.m.) (Ex. 2). In the email, Plaintiffs informed Defendants that Plaintiffs would be moving to stay enforcement of the January 2, 2013 Minute Order, including with respect to the ruling on Defendants' Motion for Return, and would be pursuing an interlocutory appeal of the January 2, 2013 Minute Order. Defendants responded promptly and notified Plaintiffs that Defendants would not consent to any such motion to stay. *See Email from Charles F.B. McAleer, Jr. to David I. Schoen* (January 9, 2013, 6:28 p.m.) (Ex. 3). Within hours, Mr. Schoen filed a motion to stay and a notice of appeal on behalf of Plaintiffs. *See DE 211, 212.*<sup>1</sup>

Mr. Schoen did not seek expedited briefing, hearing or disposition of the motion to stay. Nor did he seek any certification from this Court relating to Plaintiffs' attempted appeal of the January 2, 2013 Minute Order. Moreover, nowhere in those communications or filings did Mr. Schoen indicate that he would be seeking to withdraw as counsel for Plaintiffs. Plaintiffs did not file the required certification of compliance on January 9, 2013 and, thus, did not timely comply with the January 2, 2013 ruling regarding Defendants' Motion for Return.

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<sup>1</sup> Plaintiffs did not file their Motion to Stay until 1:40 a.m. on January 10, 2013, the day after they were required to certify to the Court their full compliance with the January 2, 2013 ruling on Defendants' Motion for Return. DE 212.

Yesterday, seven days after filing the Motion to Stay and the Notice of Appeal, Mr. Schoen filed a “Notice of Withdrawal of Appearance As Co-Counsel of Record for All Plaintiffs” (“Notice of Withdrawal”) (DE 214, 11:04 a.m.). Purporting to give notice “pursuant to LCvR 83.2(h) and LCvR 83.6(b),” Mr. Schoen does not explain his reasons for seeking withdrawal, does not present the signatures of Plaintiffs consenting to the withdrawal (as required by LCvR 83.6(b)) and asks the Court to excuse his non-compliance with LCvR 83.6(b) “under all attending circumstances,” which he does not explain or disclose in his Notice. Mr. Schoen also does not reference Rule 1.16 of the District of Columbia Bar’s Rules of Professional Conduct (Declining or Terminating Representation), let alone certify his compliance with all aspects of that rule regarding his attempt to withdrawal as counsel for Plaintiffs in this case.

Thirty minutes after Mr. Schoen filed his Notice of Withdrawal, Robert J. Tolchin, who has been Plaintiffs’ counsel of record since July 21, 2011 (DE 129), sent an email to Defense counsel seeking their consent to a continuance of the January 18, 2013 hearing, as follows:

As you are aware from the docket, David Schoen had some personal issues and has withdrawn from this case. I see that there's a conference this Friday. David Schoen scheduled this and had been expected to handle it. I am personally not available that day as I have previous commitments. My schedule is relatively flexible during the following two weeks (other than Fridays). Would you be agreeable to rescheduling the conference? --Bob Tolchin

*See Email from Robert J. Tolchin to Richard A. Hibey (January 16, 2013, 11:33 a.m.) (Ex. 4).*  
Contrary to Plaintiffs’ suggestion (DE 215, Memorandum at p. 2), Defendants did not fail or refuse to respond to Mr. Tolchin’s email. In fact, Defendants were in the process of responding to his email when he telephoned lead counsel for Defendants at 2:45 p.m. yesterday. Mr. Tolchin then filed the present Motion for Continuance.

## ARGUMENT

Mr. Tolchin's Motion for Continuance is implausible or false in several respects. It not only fails to justify a continuance but, in fact, reinforces the Court's previous decision to schedule the January 18, 2013 status conference.

Mr. Tolchin, who failed to appear for the December 7, 2012 status conference convened by the Court, asserts that Mr. Schoen has been "functioning as 'lead counsel'" and has "made all the court appearances" since his July 22, 2012 appearance in this case. DE 215, Memorandum at p. 1. Mr. Tolchin claims that it will take him "at least a few days or weeks to come up to speed and take over all that Mr. Schoen was handling." *Id.* at pp. 1-2. These are at best misleading and at worst false representations. Mr. Tolchin was sole counsel of record in this case for an entire year before Mr. Schoen's appearance, and the record is replete with his intemperate and improper filings and communications during that pre-Schoen period. Mr. Tolchin's role did not abate even after Mr. Schoen's appearance in the case. In the six months since Mr. Schoen's appearance, Mr. Tolchin has sent at least 264 emails to Defense counsel, as reflected in the list attached as Exhibit 5, over five times as many as Mr. Schoen.<sup>2</sup> As the Court is aware from the litany of discovery motions that Mr. Tolchin and Mr. Schoen filed, many of Mr. Tolchin's email communications with Defense counsel continued to be intemperate and improper, including even threats to file Bar complaints against Defense counsel without any basis for doing so and solely to secure an advantage in civil discovery disputes. The indisputable record of Mr. Tolchin's active and extensive involvement in this case since Mr. Schoen's appearance reveals that his representations in the Motion for Continuance as utterly false. Finally, the December 7, 2012

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<sup>2</sup> Mr. Schoen did not send his first email to Defense counsel until he had been in the case for a month and, during the same period (July 22, 2012 until January 13, 2013), he sent a total of only 46 emails to Defense counsel.

status conference was the only “court appearance” after Mr. Schoen entered the case, and Mr. Tolchin’s failure to appear at that status conference reflects his choice, rather than the nature of Mr. Schoen’s role.

Mr. Tolchin also claims that he “had not previously planned to attend [the January 18, 2013] conference” and “had expected Mr. Schoen to be handling it.” DE 215, Memorandum at p. 2. However, Mr. Tolchin also represents to the Court that Mr. Schoen “had discussed the possibility of his withdrawal over the past few weeks.” *Id.* at p. 1. If the latter is true, then the former is implausible because Mr. Tolchin would have been well aware “over the past few weeks” that he, not Mr. Schoen, would have to attend the January 18, 2013 status conference. If, as Mr. Tolchin now claims, he “had not previously planned to attend” the January 18, 2013 status conference, then he either acted irresponsibly in doing so or is making a false representation to this Court to secure a continuance.<sup>3</sup>

Defendants respectfully submit that there are also many practical reasons for the Court to hold the January 18, 2013 status conference, as scheduled, and to deny Mr. Tolchin’s motion for continuance.

*Mr. Schoen’s Requested Withdrawal:* In learning that Mr. Schoen is seeking to withdraw for undisclosed reasons from this case, Defendants note his acknowledgment that his notice does not comply with Local Rule 83.6(b) and that his request to the Court to excuse compliance therewith “under all attending circumstances,” DE 214 at p.1, n.1 fails to specify what those “attending circumstances” are.

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<sup>3</sup> Mr. Tolchin writes that he is “personally not available to attend the conference on Friday due to a longstanding family obligation that same day.” *Id.* at p. 2. Defendants have no basis to believe or dispute that assertion, and Mr. Tolchin offers the Court no details regarding the “longstanding family obligation.”

While Defendants would otherwise be willing to accommodate an opposing counsel's schedule, we are unwilling to do so in this instance. First, the Court has not approved Mr. Schoen's withdrawal from the case or excused his non-compliance with Local Rule 83.6(b). In light of such non-compliance, the Court might likely construe Mr. Schoen's filing as a motion under Local Rule 83.6(c). Indeed, the Court might require certain proffers from Mr. Schoen before granting withdrawal, particularly given certain of the positions regarding his predecessor's communications with the Shatsky plaintiffs that Mr. Schoen took before the Court at the hearing on December 7, 2012. In the absence of any assertion by Mr. Schoen in his Notice of Withdrawal that he has complied with Rule 1.16 of the D.C. Bar's Rules of Professional Conduct, the Court might require proffers from Mr. Schoen that he has done so. Defendants are also concerned that Plaintiffs or Mr. Tolchin will use the excuse of any withdrawal by Mr. Schoen to secure tactical or scheduling advantages in this case. Requiring Plaintiffs to address such issues and concerns sooner rather than later is preferable and prudent.

*Plaintiffs' Continuing Failure to Comply With The Court's January 2, 2013 Ruling Regarding Defendants' Motion for Return (DE 170).* Plaintiffs have failed to comply with the requirements of the Court's Protective Order (*See* August 28, 2012 Minute Order) and its January 2, 2013 ruling regarding Defendants' Motion for Return, and such continuing violation of this Court's orders raises serious concerns for Defendants which can and should be addressed at the January 18, 2013 hearing. This is particularly so given recent publicity regarding Plaintiffs' failure to comply, the occurrence of which does not appear merely coincidental. It is also important given Mr. Schoen's request to withdraw from the case and his personal obligation to ensure his own compliance with the Court's January 2, 2013 Minute Order.

Defendants will be filing in the D.C. Circuit a motion to dismiss Plaintiffs' improvidently noticed appeal of this Court's January 2, 2013 Minute Order and will also be filing an opposition to Plaintiffs' motion to stay enforcement of that Minute Order. However, given the infirm nature of both filings by Plaintiffs and the need to secure prompt and complete compliance by Plaintiffs with this Court's orders, retaining the January 18, 2013 status conference is critical.

*Various Scheduling Issues Requiring The Court's Consideration and Resolution:* There are also various scheduling issues that require resolution and would benefit from timely consideration at the January 18, 2013 status conference.

As a general matter, Defendants' insistence on going forward with a hearing on January 18 is prompted by our concern that the case deadlines that the Court has set will once again be blown for insufficient reasons wholly fabricated by Plaintiffs' counsel. In the pleading Mr. Schoen filed, he specifically asks the Court not to require him to express reasons for his withdrawal from the case. In Mr. Tolchin's Motion for Continuance, he advises that Mr. Schoen voiced personal reasons for his desire to withdraw. What the Court does not know is what the real reasons are behind this development; more importantly, whether those reasons have an impact on the proper ethical and legal conduct of the case and, accordingly, on the interests of justice. *See Local Rule 83.6(c).* At a minimum, the Court should inquire further into this matter. Defendants do not insist on a public hearing on the reasons so long as the Court knows what they are, unless they impact compliance with a standing order of the Court.<sup>4</sup>

There are also specific scheduling issues for resolution. For example, at the December 7, 2012 status conference and by Minute Order dated December 8, 2012, the Court required

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<sup>4</sup> In other cases in which Mr. Tolchin has been counsel, the courts have indulged his personal commitments by scheduling telephonic or videophonic appearances. The Court may wish to extend such an accommodation to him in this instance in the interest of hewing to the scheduled hearing time and date.

Plaintiffs to appear in the District of Columbia for depositions and Rule 35 examinations.

Shortly after that ruling, Defendants began requesting dates from Plaintiffs for the depositions and examinations, emphasizing the importance of scheduling them so that Defendants can meet the February 14, 2013 deadline for their disclosure of additional damages experts related to such examinations and depositions. Defendants even agreed to limit the number of depositions to the ten Defendants originally noticed on August 3, 2012. Several weeks later, on January 9, 2012, Plaintiffs finally provided Defendants with the first scheduling information for those depositions and examinations. While it appears the parties have finally reached agreement on a schedule for the depositions and Rule 35 examinations of the ten plaintiffs, the delayed dates provided by Plaintiffs require a one-week extension of the February 14, 2013 deadline for Defendants, if approved by the Court.

Other deadlines regarding the completion of expert discovery and the filing of summary judgment motions could be addressed and set or confirmed by the Court at the January 18, 2013 status conference and would benefit from early consideration, particularly given the uncertainty created by the filing of Mr. Schoen's Notice of Withdrawal.

### **CONCLUSION**

For these and such other reasons as may appear just, Defendants respectfully ask the Court to deny Plaintiffs' motion for continuance and to conduct the January 18, 2013 status conference as scheduled. A proposed Order is being filed herewith.

Dated: January 17, 2013

Respectfully submitted,

/s/ Richard A. Hibey

Richard A. Hibey (No. 74823)  
Mark J. Rochon (No. 376042)  
Charles F. B. McAleer, Jr. (No. 388681)  
Timothy P. O'Toole (No. 469800)  
MILLER & CHEVALIER CHARTERED  
655 15th St., N.W., Suite 900  
Washington D.C. 20005-6701  
(202) 626-5800 (telephone)  
(202) 626-5801 (facsimile)

*Attorneys for Defendants The Palestine Liberation Organization and The Palestinian Authority*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 17, 2013, a true and genuine copy of the foregoing was served via ECF on the following:

Robert J. Tolchin  
The Berkman Law Office, LLC  
111 Livingston Street – Suite 1928  
Brooklyn, NY 11201  
[rjt@tolchinlaw.com](mailto:rjt@tolchinlaw.com)

David I. Schoen  
2800 Zelda Road, Suite 100-6  
Montgomery, AL 36106  
[dschoen593@aol.com](mailto:dschoen593@aol.com)  
[Schoenlawfirm@gmail.com](mailto:Schoenlawfirm@gmail.com)

*Attorneys for Plaintiffs*

/s/ Richard A. Hibey  
Richard A. Hibey

# EXHIBIT 1

**From:** McAleer, Chas  
**Sent:** Friday, January 04, 2013 12:17 PM  
**To:** Robert Tolchin; David Schoen; dschoen593; Dina Rovner; Rachel Weiser; M Haller  
**Cc:** Hibey, Richard; Rochon, Mark; O'Toole, Timothy; Eustice, John  
**Subject:** Shatsky -- Request for Plaintiffs' Compliance with January 2, 2013 Minute Order Granting DE 170

Counsel,

In accordance with the portion of the Court's January 2, 2013, Minute Order granting Defendant The Palestinian Authority's Motion for Return or Destruction of an Inadvertently Produced Document (DE 170), please confirm that Plaintiffs and their counsel will take the following steps (all of which were specifically requested in the Motion):

1. Destroy, or return to counsel for Defendants, all copies, notes, translations and summaries of the documents marked as Sealed Exhibits 1 and 1A from the September 12, 2012, deposition of Ibrahim Dahbour ("Dahbour Deposition");
2. Destroy the portions of any documents, computer files, or other materials containing notes, translations, summaries of, or quotations from, the documents marked as Sealed Exhibits 1 and/or 1A at the Dahbour Deposition;
3. Destroy, or return to counsel for Defendants, the portion of the Dahbour Deposition transcript, from page 143, line 19 through page 163, line 8, and all other materials containing notes, translations or summaries, that discuss or reference the contents of the documents marked as Sealed Exhibits 1 and 1A, including the corresponding portions of the videotape recording of the Dahbour Deposition;
4. Provide counsel for Defendants with a list of all persons to whom Plaintiffs' counsel distributed or communicated any portion, copies, notes, translations or summaries of the documents marked as Sealed Exhibits 1 and/or 1A at the Dahbour Deposition, including the portion of the Dahbour Deposition transcript and corresponding portion of the Dahbour Deposition videotape recording that discusses the contents of Sealed Exhibits 1 and/or 1A; and
5. Submit a declaration to the Court within five (5) business days, which we calculate to fall on Wednesday, January 9, 2013, certifying that the steps required by Paragraphs 1 through 4 above have been taken, and further certifying that Plaintiffs, their counsel and anyone identified pursuant to Paragraph 4 above will make no use of or disclose the information learned (or subsequently acquired) as a result of the inadvertent disclosure of the privileged and protected documents marked as Sealed Exhibits 1 and 1A at the Dahbour Deposition.

Thank you.

Regards,

--Chas

**Charles F. B. McAleer, Jr.**  
Miller & Chevalier Chartered  
655 Fifteenth Street, N.W., Suite 900  
Washington, D.C. 20005  
(Direct) 202.626.5963  
(Main) 202.626.5800  
(Fax) 202.626.5801

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## **EXHIBIT 2**

**From:** [dschoen593@aol.com](mailto:dschoen593@aol.com) [mailto:[dschoen593@aol.com](mailto:dschoen593@aol.com)]  
**Sent:** Wednesday, January 09, 2013 4:30 PM  
**To:** McAleer, Chas; Hibey, Richard; Rochon, Mark; O'Toole, Timothy; Eustice, John  
**Cc:** [rjt.berkman@gmail.com](mailto:rjt.berkman@gmail.com); [schoenlawfirm@gmail.com](mailto:schoenlawfirm@gmail.com); [rachelmayweiser@gmail.com](mailto:rachelmayweiser@gmail.com); [dsrovner@gmail.com](mailto:dsrovner@gmail.com)  
**Subject:**

Chas:

I am writing to see if, with respect to the minute order granting DE 170, defendants would consent to the entry of a stay of that order in order to enable plaintiffs to seek appellate review. I have given the matter a good deal of thought and I would like to be able to give plaintiffs that opportunity. Naturally, plaintiffs would agree to maintain the status quo pursuant to our agreement.

Please let me know at your earliest convenience.

Thank you,

David Schoen

## **EXHIBIT 3**

**From:** McAleer, Chas  
**Sent:** Wednesday, January 09, 2013 6:28 PM  
**To:** 'dschoen593@aol.com'; [rjt.berkman@gmail.com](mailto:rjt.berkman@gmail.com); [schoenlawfirm@gmail.com](mailto:schoenlawfirm@gmail.com); [rachelmayweiser@gmail.com](mailto:rachelmayweiser@gmail.com); [dsrovner@gmail.com](mailto:dsrovner@gmail.com)  
**Cc:** Hibey, Richard; Rochon, Mark; O'Toole, Timothy; Eustice, John  
**Subject:** RE:

David:

We will not consent to a motion to stay the order or to stay the proceedings, whether for interlocutory appellate review or otherwise. However, if you are inclined to proceed with a motion to such effect nonetheless, and you intend to make representations in it as to maintaining the "status quo", you will need to explain exactly what the "status quo" is. You have refused repeated requests from us in the past to disclose what the "status quo" is, for example, by identifying all of the persons to whom the document at issue (or its contents) have been disclosed. Moreover, Plaintiffs have made repeated and extensive use of the document at issue, in violation of Plaintiffs' obligations under the Protective Order, Rule 26(b)(5)(B) and otherwise. Accordingly, your notion of "status quo" seems to be very different than ours. Moreover, as I should not need to remind you, your deadline for compliance with the Court's Minute Order dated January 2, 2013, is today. Waiting until 4:30 p.m. on that deadline to inform us of this nebulously phrased potential request is inconsistent with an effort to comply with that order. Obviously, unless and until the Court relieves of you of complying with its Order, you need to comply with it, not raise last minute requests to avoid or delay doing so.

Regards,

--Chas

**Charles F. B. McAleer, Jr.**  
Miller & Chevalier Chartered  
655 Fifteenth Street, N.W., Suite 900  
Washington, D.C. 20005  
(Direct) 202.626.5963  
(Main) 202.626.5800  
(Fax) 202.626.5801

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**From:** [dschoen593@aol.com](mailto:dschoen593@aol.com) [mailto:[dschoen593@aol.com](mailto:dschoen593@aol.com)]

**Sent:** Wednesday, January 09, 2013 4:30 PM

**To:** McAleer, Chas; Hibey, Richard; Rochon, Mark; O'Toole, Timothy; Eustice, John

**Cc:** [rjt.berkman@gmail.com](mailto:rjt.berkman@gmail.com); [schoenlawfirm@gmail.com](mailto:schoenlawfirm@gmail.com); [rachelmayweiser@gmail.com](mailto:rachelmayweiser@gmail.com); [dsrovner@gmail.com](mailto:dsrovner@gmail.com)

**Subject:**

I am writing to see if, with respect to the minute order granting DE 170, defendants would consent to the entry of a stay of that order in order to enable plaintiffs to seek appellate review. I have given the matter a good deal of thought and I would like to be able to give plaintiffs that opportunity. Naturally, plaintiffs would agree to maintain the status quo pursuant to our agreement.

Please let me know at your earliest convenience.

Thank you,

David Schoen

## **EXHIBIT 4**

-----Original Message-----

From: Robert Tolchin [<mailto:rтолчин@berkmanlaw.com>]

Sent: Wednesday, January 16, 2013 11:33 AM

To: Hibey, Richard

Cc: Tolchin Robert; Rochon, Mark; McAleer, Chas

Subject: Shatsky

Dick,

As you are aware from the docket, David Schoen had some personal issues and has withdrawn from this case.

I see that there's a conference this Friday. David Schoen scheduled this and had been expected to handle it.

I am personally not available that day as I have previous commitments.

My schedule is relatively flexible during the following two weeks (other than Fridays). Would you be agreeable to rescheduling the conference?

--Bob Tolchin

Sent from my iPad

## **EXHIBIT 5**

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>From</b>	<b>To</b>	<b>Subject</b>	<b>Received</b>	<b>Cat...</b>
<b>Date: Older</b>								
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas; Ferguson, La ..	Shatsky	Sun 7/22/2012 3:20 PM	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas; Ferguson, La ..	Shatsky	Sun 7/22/2012 3:27 PM	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas; dschoen593..	Re: Shatsky v. The Syrian Arab Republic, et al. (D.D.C.)	Mon 7/23/2012 7:34 ...	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas; dschoen593..	Shatsky - Saadat Deposition	Mon 7/23/2012 7:35 ...	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Re: Shatsky - Saadat Deposition	Tue 7/24/2012 11:06 ...	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas; Ferguson, La..	Shatsky	Wed 7/25/2012 7:07 ...	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas; Ferguson, La... Re:	Shatsky	Wed 7/25/2012 7:15 ...	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas; Ferguson, La..	Shatsky	Wed 7/25/2012 7:17 ...	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas; Ferguson, La... Shatsky		Wed 7/25/2012 7:23 ...	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas; Ferguson, La..	Shatsky - confirmation please	Wed 7/25/2012 7:25 ...	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Re: Shatsky - Saadat Deposition	Wed 7/25/2012 9:40 ...	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Shatsky - Subpoenas	Wed 7/25/2012 9:56 ...	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas; Ferguson, La..	Shatsky	Wed 7/25/2012 1:04 P...	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas; Ferguson, La... Re:	Shatsky - confirmation please	Wed 7/25/2012 1:05 P...	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas; Hibey, Richard	Shatsky	Thu 7/26/2012 11:40 ...	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Re Shatsky - Subpoenas	Mon 7/30/2012 4:40 ...	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Shatsky	Mon 7/30/2012 4:27 P...	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Malouh Deposition	Mon 7/30/2012 4:29 P...	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Re: Malouh Deposition	Tue 7/31/2012 11:03 ...	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Re: Shatsky	Tue 7/31/2012 3:58 PM	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Re: Shatsky	Wed 8/1/2012 11:19 ...	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Re: Shatsky v. The Syrian Arab Republic, et al. (D.D.C.)	Wed 8/1/2012 1:29 PM	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Re: Shatsky	Thu 8/2/2012 10:56 AM	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Re: Shatsky	Thu 8/2/2012 12:16 PM	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Re: Shatsky	Fri 8/3/2012 6:38 AM	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Re: Shatsky	Fri 8/3/2012 7:39 AM	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Shatsky	Sun 8/5/2012 10:13 AM	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Shatsky	Sun 8/5/2012 10:44 AM	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Shatsky v. PLO/PA	Mon 8/6/2012 9:39 AM	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Re: Shatsky v. The Syrian Arab Republic, et al (D.D.C.)	Mon 8/6/2012 9:45 AM	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Re: Shatsky	Tue 8/7/2012 10:09 AM	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Re: Shatsky -- June 4, 2012 Subpoenas to Arab Bank...	Tue 8/7/2012 2:10 PM	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Re: Shatsky v. PLO/PA	Wed 8/8/2012 5:23 AM	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Re: Shatsky -- Plaintiffs' Subpoenas to Non-Parties	Wed 8/8/2012 5:33 AM	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Re: Shatsky v. PLO/PA	Wed 8/8/2012 1:56 PM	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Re: Shatsky v. PLO/PA	Wed 8/8/2012 3:47 PM	
<input checked="" type="checkbox"/>				Robert Tolchin	McAleer, Chas	Re: Shatsky v. PLO/PA	Wed 8/8/2012 7:15 PM	
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			<b>From</b>	<b>To</b>	<b>Subject</b>	<b>Received</b>	<b>Cat...</b>
			Robert Tolchin	McAleer, Chas	Re: Sami Ramlawi	Wed 8/15/2012 5:29 P...	
			Robert Tolchin	McAleer, Chas; Rochon, Mar...	Shatsky	Wed 8/15/2012 5:33 P...	
			Robert Tolchin	McAleer, Chas	Re: Shatsky	Thu 8/16/2012 6:35 AM	
			Robert Tolchin	McAleer, Chas	Re: Shatsky	Thu 8/16/2012 6:49 AM	
			Robert Tolchin	McAleer, Chas, Ferguson, La...	Shatsky	Thu 8/16/2012 8:02 AM	
			Robert Tolchin	McAleer, Chas; Ferguson, La ...	Shatsky	Thu 8/16/2012 9:51 AM	
			Robert Tolchin	McAleer, Chas	Re: Shatsky v. The Syrian Arab Republic, et al. 02-22...	Thu 8/16/2012 10:39 ...	
			Robert Tolchin	McAleer, Chas	Shatsky	Thu 8/16/2012 10:47 ...	
			Robert Tolchin	McAleer, Chas	Re: Shatsky	Thu 8/16/2012 5:52 PM	
			Robert Tolchin	McAleer, Chas	Shatsky Question	Fri 8/17/2012 8:55 AM	
			Robert Tolchin	McAleer, Chas	Re: Shatsky Question	Fri 8/17/2012 9:10 AM	
			Robert Tolchin	McAleer, Chas	Re Shatsky Question	Fri 8/17/2012 9:44 AM	
			Robert Tolchin	McAleer, Chas	Re: Shatsky Question	Fri 8/17/2012 10:29 AM	
			Robert Tolchin	McAleer, Chas	Re: Shatsky Question	Sun 8/19/2012 6:49 AM	
			Robert Tolchin	McAleer, Chas	Re: Shatsky	Sun 8/19/2012 6:56 AM	
			Robert Tolchin	McAleer, Chas	Re: Shatsky	Sun 8/19/2012 7:23 AM	
			Robert Tolchin	McAleer, Chas; Ferguson, La...	Re: Shatsky	Sun 8/19/2012 7:30 AM	
			Robert Tolchin	McAleer, Chas; Ferguson, La..	Shatsky	Mon 8/20/2012 7:30 ...	
			Robert Tolchin	McAleer, Chas	Re Shatsky Question	Mon 8/20/2012 12:03 ...	
			Robert Tolchin	McAleer, Chas	Shatsky	Mon 8/20/2012 3:53 P..	
			Robert Tolchin	McAleer, Chas	Shatsky	Mon 8/20/2012 4:51 P...	
			Robert Tolchin	McAleer, Chas; Eustice, John...	Shatsky Fees and Expenses	Wed 8/22/2012 8:09 ...	
			Robert Tolchin	McAleer, Chas	Shatsky	Wed 8/22/2012 8:12 ...	
			Robert Tolchin	McAleer, Chas	Re: Shatsky	Wed 8/22/2012 8:16 ...	
			Robert Tolchin	McAleer, Chas; Eustice, John...	Re: Shatsky Fees and Expenses	Thu 8/23/2012 9:23 AM	
			Robert Tolchin	McAleer, Chas	Re: Shatsky	Thu 8/23/2012 11:13 ...	
			Robert J. Tolchin	McAleer, Chas; Ferguson, La ..	Shatsky	Thu 8/23/2012 2:05 PM	
			Robert J. Tolchin	McAleer, Chas; Ferguson, La ..	Shatsky	Fri 8/24/2012 5:29 AM	
			Robert J. Tolchin	McAleer, Chas; hallermm@g...	RE: Shatsky Fees and Expenses	Fri 8/24/2012 6:02 AM	
			Robert Tolchin	McAleer, Chas	Re: Shatsky Fees and Expenses	Tue 8/28/2012 6:09 AM	
			Robert J. Tolchin	McAleer, Chas	Shatsky Depositions	Tue 8/28/2012 1:28 PM	
			Robert J. Tolchin	McAleer, Chas	RE: Shatsky Depositions	Tue 8/28/2012 1:41 PM	
			Robert Tolchin	McAleer, Chas; Ferguson, La...	Shatsky	Wed 8/29/2012 6:15 ...	
			Robert Tolchin	McAleer, Chas	Re: Shatsky Fees and Expenses	Wed 8/29/2012 6:16 ...	
			Robert Tolchin	McAleer, Chas	Re: Shatsky Fees and Expenses	Wed 8/29/2012 9:04 ...	
			Robert Tolchin	McAleer, Chas; Ferguson, La..	Re: Shatsky	Wed 8/29/2012 11:25 ...	
			Robert Tolchin	McAleer, Chas	Re: Shatsky Fees and Expenses	Thu 8/30/2012 12:55 ...	
			Robert Tolchin	McAleer, Chas; Ferguson, La...	Re Shatsky	Sat 9/1/2012 8:46 PM	
			Robert Tolchin	McAleer, Chas	Re Shatsky Fees and Expenses	Sat 9/1/2012 8:51 PM	
			Robert J. Tolchin	McAleer, Chas	Malouh deposition	Sat 9/1/2012 11:38 PM	
			Robert Tolchin	McAleer, Chas	Re: Shatsky Fees and Expenses	Sun 9/2/2012 3:41 PM	
			Robert J. Tolchin	McAleer, Chas; 'Mordechai ...	Shatsky	Mon 9/3/2012 1:52 AM	
			Robert J. Tolchin	McAleer, Chas; 'Mordechai ...	Subpoena Shatsky v. Syria	Mon 9/3/2012 1:56 AM	
			Robert J. Tolchin	McAleer, Chas; dschoen593...	Shatsky	Mon 9/3/2012 8:51 AM	
			Robert J. Tolchin	McAleer, Chas; 'Mordechai ..	RE: September 9	Mon 9/3/2012 8:59 AM	
			Robert J. Tolchin	McAleer, Chas; hallermm@g...	RE: Shatsky Fees and Expenses	Mon 9/3/2012 9:07 AM	
			Robert J. Tolchin	McAleer, Chas; dschoen593...	RE: Shatsky	Mon 9/3/2012 9:11 AM	
			Robert J. Tolchin	McAleer, Chas; hallermm@g...	RE: Shatsky Fees and Expenses	Mon 9/3/2012 4:13 PM	
			Robert J. Tolchin	McAleer, Chas; hallermm@g...	Malouh	Mon 9/3/2012 4:15 PM	
			Robert J. Tolchin	McAleer, Chas; hallermm@g...	RE: Shatsky Fees and Expenses	Mon 9/3/2012 4:16 PM	
			Robert J. Tolchin	McAleer, Chas; hallermm@g...	RE: Malouh	Mon 9/3/2012 4:38 PM	

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					Robert Tolchin	McAleer, Chas; hallermm@g...	Re: Shatsky Fees and Expenses	Fri 9/7/2012 6:14 AM	
					Robert Tolchin	McAleer, Chas; Hibey, Richard...	Shatsky	Mon 9/10/2012 1:37 P...	
					Robert Tolchin	McAleer, Chas	Re: Shatsky -- Plaintiffs' Responses to Defendants' Fi...	Mon 9/10/2012 2:07 P...	
					Robert Tolchin	McAleer, Chas	Shatsky	Thu 9/13/2012 11:40 ...	
					Robert Tolchin	McAleer, Chas	Re: Shatsky	Fri 9/14/2012 3:49 AM	
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					Robert Tolchin	McAleer, Chas; Eustice, John...	Shatsky	Fri 9/21/2012 8:09 AM	
					Robert Tolchin	McAleer, Chas; Eustice, John...	Shatsky - Confidentiality Designations	Fri 9/21/2012 8:18 AM	
					Robert Tolchin	McAleer, Chas; Eustice, John...	Re: Shatsky - Confidentiality Designations	Fri 9/21/2012 8:26 AM	
					Robert Tolchin	McAleer, Chas; Eustice, John...	Re: Shatsky - Confidentiality Designations	Tue 9/25/2012 1:39 AM	
					Robert Tolchin	McAleer, Chas	Re: Shatsky	Tue 9/25/2012 6:03 AM	
					Robert Tolchin	McAleer, Chas; Eustice, John...	Shatsky	Fri 9/28/2012 10:58 AM	
					Robert Tolchin	McAleer, Chas	Re: Shatsky - Confidentiality Designations	Sun 9/30/2012 8:17 AM	
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					Robert Tolchin	McAleer, Chas	Shatsky	Wed 10/3/2012 2:02 P...	
					Robert Tolchin	McAleer, Chas	Re: Shatsky	Fri 10/5/2012 1:25 AM	
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					Robert Tolchin	McAleer, Chas	Re: Shatsky	Fri 10/5/2012 10:14 AM	
					Robert Tolchin	McAleer, Chas	Re: Shatsky	Fri 10/5/2012 10:26 AM	
					Robert Tolchin	McAleer, Chas	Re: Shatsky	Fri 10/5/2012 10:31 AM	
					Robert Tolchin	McAleer, Chas	Re: Shatsky	Fri 10/5/2012 10:33 AM	
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					Robert Tolchin	McAleer, Chas; Hibey, Richard...	Shatsky	Sun 10/7/2012 6:44 AM	
					Robert Tolchin	McAleer, Chas	Re: Shatsky - Confidentiality Designations	Sun 10/7/2012 7:00 AM	
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					Robert Tolchin	McAleer, Chas; Hibey, Richard...	Re: Shatsky	Wed 10/10/2012 2:14 ...	
					Robert Tolchin	McAleer, Chas	Re: Shatsky	Wed 10/10/2012 4:50 ...	
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					Robert J. Tolchin	McAleer, Chas; 'dschoen593'...	RE: Shatsky	Thu 10/11/2012 9:38 ...	
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					Robert J. Tolchin	McAleer, Chas; Dina Rovner	Shatsky	Fri 10/12/2012 7:14 AM	
					Robert J. Tolchin	McAleer, Chas; Dina Rovner;...	Shatsky	Fri 10/12/2012 10:18 ...	
					Robert Tolchin	McAleer, Chas; Dina Rovner;...	Re: Shatsky	Tue 10/16/2012 7:40 ...	
					Robert J. Tolchin	McAleer, Chas; hallermm@g...	RE: Shatsky	Tue 10/16/2012 10:19...	
					Robert J. Tolchin	McAleer, Chas; hallermm@g...	RE: Shatsky	Tue 10/16/2012 12:41...	
					Robert Tolchin	McAleer, Chas	Re: Shatsky	Wed 10/17/2012 6:30 ...	
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					Robert Tolchin	McAleer, Chas	Re: Shatsky	Fri 10/19/2012 9:52 AM	
					Robert Tolchin	Hibey, Richard; Rochon, Mar...	Shatsky damages experts	Fri 10/19/2012 1:22 PM	
					Robert Tolchin	McAleer, Chas	Re: Shatsky	Sun 10/21/2012 2:54 ...	
					Robert Tolchin	McAleer, Chas	Re: Shatsky	Sun 10/21/2012 3:12 ...	
					Robert Tolchin	Mordechai Haller	Re: Shatsky	Mon 10/22/2012 5:21 ...	
					Robert Tolchin	Mordechai Haller	Re: Shatsky	Mon 10/22/2012 5:22 ...	
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	<b>From</b>	<b>To</b>	<b>Subject</b>	<b>Received</b>	<b>Cat...</b>
1	Robert Tolchin	McAleer, Chas; dschoen593...	Shatsky	Mon 10/22/2012 7:57 ...	
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3	Robert Tolchin	McAleer, Chas	Re Shatsky	Mon 10/22/2012 12:5...	
4	Robert Tolchin	McAleer, Chas	Re Shatsky	Mon 10/22/2012 2:41 ...	
5	Robert Tolchin	Mordechai Haller	Re: Shatsky	Mon 10/22/2012 3:11 ...	
6	Robert Tolchin	McAleer, Chas	Re: Shatsky	Tue 10/23/2012 6:21 ...	
7	Robert Tolchin	McAleer, Chas; dschoen593...	Re: Shatsky	Tue 10/23/2012 6:28 ...	
8	Robert Tolchin	McAleer, Chas; Dina Rovner	Shatsky	Tue 10/23/2012 1:46 ...	
9	Robert J. Tolchin	McAleer, Chas; 'Mordechai ...	RE: Shatsky	Tue 10/23/2012 5:09 ...	
10	Robert Tolchin	McAleer, Chas	Re: Shatsky	Wed 10/24/2012 7:32 ...	
11	Robert Tolchin	McAleer, Chas	Re: Shatsky	Mon 10/29/2012 8:30 ...	
12	Robert Tolchin	McAleer, Chas	Re: Shatsky	Mon 10/29/2012 9:48 ...	
13	Robert Tolchin	McAleer, Chas	Re: Shatsky	Tue 10/30/2012 4:26 ...	
14	Robert Tolchin	McAleer, Chas	Re: Shatsky	Wed 10/31/2012 1:15 ...	
15	Robert Tolchin	Hill, Brian	Re: Sokolow, Shatsky, Gilmore	Wed 10/31/2012 1:22 ...	
16	Robert Tolchin	McAleer, Chas	Re: Shatsky	Wed 10/31/2012 3:27 ...	
17	Robert Tolchin	McAleer, Chas	Re: Shatsky	Wed 10/31/2012 3:39 ...	
18	Robert Tolchin	McAleer, Chas; dschoen593...	Shatsky	Wed 10/31/2012 8:16 ...	
19	Robert Tolchin	McAleer, Chas; dschoen593...	Re: Shatsky	Thu 11/1/2012 7:31 AM	
20	Robert Tolchin	McAleer, Chas	Re: Shatsky	Thu 11/1/2012 7:34 AM	
21	Robert Tolchin	McAleer, Chas	Shatsky	Thu 11/1/2012 8:36 AM	
22	Robert Tolchin	McAleer, Chas	Shatsky	Thu 11/1/2012 8:41 AM	
23	Robert Tolchin	McAleer, Chas	Re: Shatsky	Thu 11/1/2012 8:57 AM	
24	Robert Tolchin	McAleer, Chas	Shatsky	Thu 11/1/2012 9:27 AM	
25	Robert Tolchin	McAleer, Chas	Re: Shatsky	Thu 11/1/2012 1:34 PM	
26	Robert Tolchin	McAleer, Chas	Re: Shatsky	Thu 11/1/2012 1:49 PM	
27	Robert Tolchin	McAleer, Chas	Shatsky - Abu Hamid Deposition	Thu 11/1/2012 2:28 PM	
28	Robert Tolchin	McAleer, Chas	Re Shatsky - Confidentiality Designations	Fri 11/2/2012 6:16 AM	
29	Robert Tolchin	McAleer, Chas	Re: Shatsky	Mon 11/5/2012 6:51 ...	
30	Robert Tolchin	McAleer, Chas	Re: Shatsky	Mon 11/5/2012 6:52 ...	
31	Robert Tolchin	McAleer, Chas	Re: Shatsky - Confidentiality Designations	Mon 11/5/2012 5:43 P...	
32	Robert Tolchin	McAleer, Chas	Re: Shatsky - Confidentiality Designations	Mon 11/5/2012 6:29 P...	
33	Robert Tolchin	McAleer, Chas	Re: Shatsky	Tue 11/6/2012 8:38 AM	
34	Robert Tolchin	McAleer, Chas	Re: Shatsky - Confidentiality Designations	Tue 11/6/2012 11:21 ...	
35	Robert Tolchin	McAleer, Chas	Re: Shatsky - Confidentiality Designations	Tue 11/6/2012 11:44 ...	
36	Robert Tolchin	McAleer, Chas	Re: Shatsky	Wed 11/7/2012 6:21 ...	
37	Robert Tolchin	McAleer, Chas	Re: Shatsky	Wed 11/7/2012 6:21 ...	
38	Robert Tolchin	McAleer, Chas	Re: Shatsky - Confidentiality Designations	Wed 11/7/2012 6:26 ...	
39	Robert Tolchin	McAleer, Chas	Re: Shatsky	Wed 11/7/2012 8:16 ...	
40	Robert Tolchin	McAleer, Chas	Re: Shatsky	Thu 11/8/2012 12:15 ...	
41	Robert Tolchin	McAleer, Chas; Aaron Solom...	2:00 PM Telephone Conference - Need to reschedule	Thu 11/8/2012 12:56 ...	
42	Robert Tolchin	McAleer, Chas	Re: Shatsky	Fri 11/9/2012 2:11 AM	
43	Robert Tolchin	McAleer, Chas	Re: Shatsky	Fri 11/9/2012 7:43 AM	
44	Robert Tolchin	McAleer, Chas	Re: Shatsky	Sun 11/11/2012 5:21 ...	
45	Robert Tolchin	McAleer, Chas	Re: 2:00 PM Telephone Conference - Need to resche...	Sun 11/11/2012 5:23 ...	
46	Robert Tolchin	McAleer, Chas	Shatsky	Sun 11/11/2012 7:19 ...	
47	Robert Tolchin	McAleer, Chas	Shatsky motion	Sun 11/11/2012 7:20 ...	
48	Robert Tolchin	McAleer, Chas	Re: Shatsky	Mon 11/12/2012 7:55 ...	
49	Robert Tolchin	McAleer, Chas	Re: Shatsky	Mon 11/12/2012 7:57 ...	
50	Robert Tolchin	McAleer, Chas	Re: 2:00 PM Telephone Conference - Need to resche...	Mon 11/12/2012 8:41 ...	
51	Robert Tolchin	Mordechai Haller	Re: 2:00 PM Telephone Conference - Need to resche...	Mon 11/12/2012 3:24 ...	

	<b>From</b>	<b>To</b>	<b>Subject</b>	<b>Received</b>	<b>Cat...</b>
✉	Robert Tolchin	McAleer, Chas	Re: Shatsky	Mon 11/12/2012 3:26 ...	
✉	Robert Tolchin	McAleer, Chas	Re: Shatsky	Tue 11/13/2012 7:08 ...	
✉	Robert Tolchin	McAleer, Chas	Re: Shatsky	Tue 11/20/2012 6:13 ...	
✉	Robert Tolchin	McAleer, Chas	Re: Shatsky	Wed 11/21/2012 7:39 ...	
✉	Robert Tolchin	McAleer, Chas	Re: Shatsky	Wed 11/21/2012 9:29 ...	
✉	Robert Tolchin	McAleer, Chas	Re: Shatsky	Wed 11/21/2012 1:11 ...	
✉	Robert Tolchin	McAleer, Chas	Re: Shatsky	Wed 11/21/2012 1:38 ...	
✉	Robert J. Tolchin	Hill, Brian	Sokolow, Shatsky, Gilmore	Wed 11/21/2012 5:35 ...	
✉	Robert Tolchin	McAleer, Chas	Shatsky	Wed 11/21/2012 5:53 ...	
✉	Robert Tolchin	McAleer, Chas	Shatsky	Fri 11/23/2012 8:02 AM	
✉	Robert Tolchin	McAleer, Chas; Dina Rovner	Re: Shatsky	Wed 11/28/2012 9:50 ...	
✉	Robert Tolchin	McAleer, Chas	Re: Shatsky	Fri 11/30/2012 4:20 AM	
✉	Robert Tolchin	McAleer, Chas	Re: Shatsky	Fri 11/30/2012 4:39 AM	
✉	Robert Tolchin	McAleer, Chas	Re: Shatsky	Fri 11/30/2012 7:17 AM	
✉	Robert Tolchin	McAleer, Chas	Shatsky	Fri 11/30/2012 8:44 AM	
<b>Date: Last Month</b>					
✉	Robert Tolchin	Hill, Brian	Sokolow, Shatsky, Gilmore	Sun 12/2/2012 1:28 PM	
✉	Robert Tolchin	Hill, Brian	Sokolow, Shatsky, Gilmore	Sun 12/2/2012 1:39 PM	
✉	Robert Tolchin	McAleer, Chas	Shatsky	Tue 12/4/2012 8:25 AM	
✉	Robert Tolchin	McAleer, Chas	Shatsky	Tue 12/4/2012 8:29 AM	
✉	Robert Tolchin	McAleer, Chas	Re: Shatsky	Thu 12/6/2012 10:51 ...	
✉	Robert Tolchin	McAleer, Chas	Shatsky	Tue 12/11/2012 7:36 ...	
✉	Robert Tolchin	McAleer, Chas	Shatsky	Wed 12/12/2012 2:43 ...	
✉	Robert Tolchin	McAleer, Chas	Re: Shatsky	Wed 12/12/2012 2:50 ...	
✉	Robert Tolchin	McAleer, Chas	Shatsky	Wed 12/12/2012 9:26 ...	
✉	Robert Tolchin	McAleer, Chas	Shatsky	Wed 12/12/2012 10:4... ...	
✉	Robert Tolchin	McAleer, Chas	Re: Shatsky	Thu 12/13/2012 12:13... ...	
✉	Robert Tolchin	McAleer, Chas	Re: Shatsky	Thu 12/13/2012 12:14... ...	
✉	Robert Tolchin	McAleer, Chas	Re: Shatsky	Fri 12/14/2012 12:59 ... ...	
✉	Robert Tolchin	McAleer, Chas	Re: Shatsky	Fri 12/14/2012 1:04 AM ...	
✉	Robert Tolchin	McAleer, Chas; Hibey, Richar...	RE: Sokolow -- Correction	Fri 12/14/2012 5:38 AM ...	
✉	Robert J. Tolchin	McAleer, Chas; Hibey, Richar...	Shatsky	Fri 12/14/2012 6:27 AM ...	
✉	Robert J. Tolchin	McAleer, Chas; Hibey, Richar...	Shatsky	Fri 12/14/2012 6:40 AM ...	
✉	Robert J. Tolchin	McAleer, Chas; dschoen593...	RE: Shatsky	Sun 12/16/2012 8:23 ... ...	
✉	Robert Tolchin	McAleer, Chas; dschoen593...	Shatsky	Mon 12/17/2012 6:07 ... ...	
✉	Robert Tolchin	McAleer, Chas	Re: Shatsky	Mon 12/17/2012 6:10 ... ...	
✉	Robert Tolchin	McAleer, Chas	Re: Shatsky	Tue 12/18/2012 4:47 ... ...	
✉	Robert Tolchin	McAleer, Chas; dschoen593...	Re: Shatsky	Tue 12/18/2012 4:48 ... ...	
✉	Robert Tolchin	McAleer, Chas	Re: Shatsky	Tue 12/18/2012 9:01 ... ...	
✉	Robert Tolchin	McAleer, Chas; dschoen593...	Re: Shatsky	Tue 12/18/2012 9:51 ... ...	
✉	Robert Tolchin	McAleer, Chas	Re: Shatsky	Tue 12/18/2012 10:13... ...	
<b>Date: Three Weeks Ago</b>					
✉	Robert Tolchin	McAleer, Chas; Hibey, Richar...	Shatsky	Sun 12/23/2012 8:30 ... ...	
✉	Robert Tolchin	McAleer, Chas; Hibey, Richar...	Shatsky, Sokolow, Gilmore	Thu 12/27/2012 3:47 ... ...	
✉	Robert Tolchin	McAleer, Chas; Hibey, Richar...	Shatsky	Fri 12/28/2012 8:56 AM ...	
<b>Date: Two Weeks Ago</b>					
✉	Robert Tolchin	McAleer, Chas; Hibey, Richar...	Shatsky	Sun 12/30/2012 11:42... ...	
✉	Robert Tolchin	McAleer, Chas; Hibey, Richar...	Shatsky	Sun 12/30/2012 11:47... ...	
✉	Robert Tolchin	McAleer, Chas	Shatsky	Wed 1/2/2013 9:03 AM ...	
✉	Robert Tolchin	McAleer, Chas; Hibey, Richar...	Re: Shatsky	Wed 1/2/2013 10:56 ... ...	
✉	Robert Tolchin	McAleer, Chas; Hibey, Richar...	Shatsky	Wed 1/2/2013 11:20 ... ...	

From	To	Subject	Received	Cat...
Robert Tolchin	McAleer, Chas; dschoen593...	Re: Shatsky	Wed 1/2/2013 11:26 ...	
Robert Tolchin	McAleer, Chas	Shatsky	Wed 1/2/2013 11:39 ...	
Robert Tolchin	McAleer, Chas	Re: Shatsky	Thu 1/3/2013 1:35 AM	
Robert Tolchin	McAleer, Chas; Hibey, Richard	Re: Shatsky	Fri 1/4/2013 5:44 AM	
<b>Date: Last Week</b>				
Robert Tolchin	McAleer, Chas	Re: Shatsky	Sun 1/6/2013 1:41 AM	
Robert Tolchin	McAleer, Chas	Shatsky	Tue 1/8/2013 7:49 AM	
Robert Tolchin	McAleer, Chas	Re: Shatsky	Tue 1/8/2013 8:09 AM	
Robert Tolchin	McAleer, Chas; Hibey, Richard	Shatsky	Wed 1/9/2013 5:25 AM	
Robert Tolchin	McAleer, Chas; Hibey, Richard	Shatsky	Wed 1/9/2013 11:48 ...	
Robert Tolchin	McAleer, Chas	Re: Shatsky	Wed 1/9/2013 1:29 PM	
Robert Tolchin	McAleer, Chas	Shatsky	Thu 1/10/2013 6:13 AM	
<b>Date: Yesterday</b>				
Robert Tolchin	McAleer, Chas	Shatsky	Tue 1/15/2013 10:45 ...	
<b>Date: Today</b>				
Robert Tolchin	Hibey, Richard	Shatsky	Wed 1/16/2013 11:38 ...	

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

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SHABTAI SCOTT SHATSKY, *et al.*, )  
v. )  
Plaintiffs, )  
THE SYRIAN ARAB REPUBLIC, *et al.*, )  
Defendants. )  
\_\_\_\_\_  
)

Civil Action No. 1:02cv02280 (RJL)

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**[PROPOSED] ORDER**

THIS MATTER, having come before the Court on Plaintiffs' "Motion For A Continuance" of the January 18, 2013 status conference previously set by the Court (DE 215) ("Motion"), and Defendants' Opposition thereto, it is now hereby

**ORDERED** that Plaintiffs' Motion (DE 215) is **DENIED**.

ENTERED this \_\_\_\_\_ day of January, 2013.

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Hon. Richard J. Leon  
United States District Judge

Copies To All Counsel By ECF