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CLERK U.S. BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA

BY _____ DEPUTY

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20 **UNITED STATES BANKRUPTCY COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA**
22 **NORTHERN DIVISION**

23 In re
24 REED E. SLATKIN,

25 Debtor.

CASE NO. ND 01-11549-RR

CHAPTER 11

A.P. NO. 02-01164

26 R. TODD NEILSON, Trustee of the
27 Chapter 11 Bankruptcy Estate of Reed E.
28 Slatkin,

Plaintiff,

v.

WILLIAM W. and ANNE HUTCHINS,
individuals, and DOES 1-10,

Defendants.

Date: To be set
Time: To be set
Place: 1415 State Street
Courtroom 201
Santa Barbara, CA 93101
[Judge Riblet]

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1 5. I have also received requests from opposing counsel that the Trustee turn
2 over the Slatkin transcripts. In each case I refused. For example, on November 7,
3 2002, counsel for Union Bank requested the Slatkin transcripts. I refused in a
4 November 13, 2002 letter, a true and correct copy of which is attached as **Exhibit 1**.

5 6. On December 11, 2002, I saw parts of the Slatkin transcripts posted on the
6 Internet at www.slatkininfo.com. Attached as **Exhibit 2** to this declaration is a true
7 and correct copy of a printout from one of the pages at www.slatkininfo.com. The line
8 reading "Reeds May 2002 Deposition - statement pt. 1, pt. 2" linked to images of the
9 Slatkin transcripts which Mr. Hutchins obtained from Spherion.

10 7. On December 12, I immediately contacted Spherion to investigate how this
11 happened and demanded that Spherion immediately return all materials to me in their
12 possession regarding Slatkin matters.

13 8. I was told that Spherion released to Mr. Hutchins copies of the transcripts of
14 the interviews of Mr. Slatkin on May 16 and 23, 2002.

15 9. Since December 11, 2002, Spherion has contacted me when other parties
16 requested copies of the Slatkin transcripts and other Slatkin-related transcripts. I have
17 never authorized Spherion to release copies of the Slatkin transcripts.

18 I declare under penalty of perjury under the laws of the United States of
19 America and the State of California that the foregoing is true and correct.

20 Executed this 19 day of December, 2002.

21
22
23 By: 

24 R. Alexander Pilmer
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27
28

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November 13, 2002

VIA FACSIMILE

Elizabeth Mann
McDermott, Will & Emery
2049 Century Park East, 34th Floor
Los Angeles, California 90067

Re: *Neilson et al. v. Union Bank et al*

Dear Elizabeth:

This letter follows your November 7th letter to me.

You have confused slightly my position about the transcripts of Mr. Slatkin's statements. I did decline your request to turn over these transcripts. I did not indicate, however, that the basis for my position was because of the U.S. Attorney's office. Nor did I say that after Mr. Slatkin was sentenced I would provide you with copies of the transcripts. Instead, I am advised that the U.S. Attorney's office will have no objection to the Banks taking Mr. Slatkin's deposition (should they choose to do so, of course), after Mr. Slatkin is sentenced.

The remainder of your letter relates to your request that Mr. Neilson, as Trustee, turn over work-product papers. As I explained in my November 1st e-mail to the Banks' counsel (yourself included), we will make available for your review beginning on November 15th the documents we have. The volume of the documents is what it is: I frankly haven't counted the pages. The sources of these documents include Mr. Slatkin, and third-parties pursuant to Rule 2004 subpoenas. We will provide you with access to the documents in exactly the same form that we received them.

Your client, however, has no right to receive copies of the work-product prepared by the Accountants to the Estate, all of which was prepared under the supervision of counsel. You will have the same documents and data that we had. You are free to have anyone you would like review and analyze the documents and data, just like we did. Likewise, I will not be asking you to deliver to me the work-product which is generated as part of that review. The results, of course, might be different if we were in the expert witness discovery stage of this case. But we're not.

Chicago

London

New York

Washington, D.C.

Exhibit 1

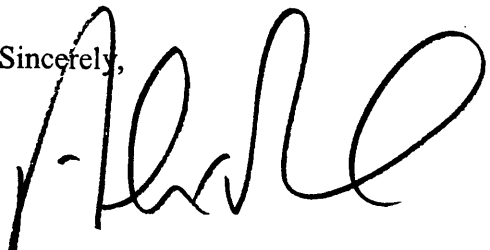
KIRKLAND & ELLIS

Elizabeth Mann
November 13, 2002
Page 2

I also don't understand your claim that the "Accountants" work-product is directly relevant to your client's "defenses." You told me in our early meeting that you couldn't comply with Rule 26 because the case was too new. I don't agree with that proposition, but it seems to me that if your client already knows of at least some defenses, your client should turn over all documents supporting those defenses.

Feel free to call me if you have any questions.

Sincerely,



R. Alexander Pilmer

RAP:gkl



Reed Slatkin Bankruptcy Inform



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Documents of Interest

- Reeds May 2002 Deposition- statement [pt 1](#), [pt 2](#)
- Trustee's First Interim Report- [link](#)
- Vixel Prospectus- Reed held a large position via early round investments the Arcxel limited partnership. Rumors are of a 400k position of a stock that traded over 50 dollars in late 99 [prospectus](#).
- Reeds Plea Bargain- [link](#)
- Dan Jacobs Plea Bargain- [link](#)
- Trustee's Interim Operating Reports- [link](#)
- Beacon Pictures Settlement- [link](#)
- George Elvin Settlement- [link](#)
- 1999- Account Balances/Investor List- [link](#)
- Chris Mancuso Phony Swiss Phone Line Memo-[link](#)
- Original Earthlink Prospectus Draft for IPO with legendary investor George Soros Invemed Associates, Inc. Co went public at \$10 per share in Jan 1997- [cover](#)
- W2 of Larry Carhart full-time computer maintenance man for 1000 25 linked PC's. Jean Janu's computers were linked by Citrix software and Carhart travelled to Santa Fe to do maintenance as well-[W2](#)
- Phyllis Rogers SEC Deposition excerpts from Jan 2000- [depo](#)
- Phyllis Rogers admitting Reed bought a "lot of stock"- [depo](#).

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Exhibit 2

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