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BRUCE H. WEITZMAN, P.C.
312/984-7736

August 30, 1990

VIA MESSENGER

Mr. John P. Messina
135 South LaSalle Street
Suite 1960
Chicago, Illinois 60603

Re: Grove Fresh v. Everfresh

Dear Mr. Messina:

Your "new complaint" makes allegations which are false and groundless. It is clear that you either know the allegations are false or you have refused to conduct the investigation required under Rule 11 of the Federal Rules of Civil Procedure.

For example, you have refused to proceed with the opportunity to take the depositions of David Murray and Bruce Fraser, during which the groundless nature of your current allegations could have been promptly exposed in the record. Your alternative course of simply concocting in a "new complaint" outrageous allegations concerning Mr. Murray and Mr. Fraser is intolerable.

John P. Messina
August 30, 1990
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This letter is to advise you that further Rule 11 sanctions will be ultimately sought for all of your improper conduct.

Very truly yours,


Bruce H. Weitzman

BHW/da/1628k/84

cc: Dale R. Crider
David J. Stetler
Lazar P. Raynal