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5 Attorney for Defendant
6 ELINA E. TODOROV

7
8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 IN AND FOR THE COUNTY OF LOS ANGELES

10	SYED HUSAIN,)	Case No. 19STCV28718
)	
11	Plaintiff,)	SUPPLEMENTAL EXHIBIT A TO
)	TO MOTION FOR CHANGE OF VENUE
12)	
	v.)	
13)	Date: 11/1/9
14	ELINA E. TODOROV,)	Time: 9:30 a.m.
)	Dept.: 12
15	Defendant.)	Judge: Honorable Barbara A. Meiers
)	

16 [Filed concurrently with Notice of Motion and
17 Motion for Attorney’s Fees and Costs for
18 Motion for Change of Venue]
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Josh Davis <joshuabealdavis@gmail.com>

Fwd: Thank you

Elina Todorov <etodorov1@gmail.com>
To: jdavis@joshdavislaw.com

Wed, Aug 28, 2019 at 8:21 AM

Sent from my iPhone

Begin forwarded message:

From: Me <shusain@me.com>
Date: May 14, 2019 at 8:46:49 AM PDT
To: Elina Todorov <etodorov1@gmail.com>
Subject: Re: Thank you

Elina,

I appreciate you telling me at least that you do not want any further contact. I will respect but unfortunately if you are not willing to sit down and talk through our issues I have no choice but to proceed with a lawsuit as I have no other recourse. All I want is to sit down talk. Simply put, I need closure. I too am not happy with the way things ended but I can't accept the way it ended and it would be best to meet and discuss in a calm manner.

The two gifts were not conditional they were in appreciation for your friendship. I have no intention of holding them over your head and I don't want you to return them. No point leaving the box with the front desk as I won't be picking them up. I have never held any gift over your head and I am offended you think that.

I do, however, expect you to honor the agreement you made with me to not ever give the silent treatment again. I'd like to work through our issues so I can at least rest easy at night.

I think you assume the lawsuit I'm talking about is for those two items but I assure you it is not, rather it is for the years of leading me on with no real intention of dating me. It's for what you did in 2017, and what you did recently. The statutes are nearing for the things you did in 2017 so my attorneys have advised me to file suit immediately before the statutes expire.

Elina, you're one of my best friends I don't want this to escalate to litigation. It will be the point of no return and the only people who will win are attorneys. Do you really want to spend all that money on attorneys and risk losing the hundreds of thousands of dollars they are planning to pursue you for? I don't want you to go through that Elina. Please think rationally rather than with emotions.

Elina, a lawsuit is going to open the door to so many things including depositions of all your ex-boyfriends that my attorneys are planning to subpoena to prove your pattern. It will involve a lengthy deposition of you that will require you by law to answer very private matters that will become public both relating to me and others. All of this will become a matter of public record. Many things you don't want the public to see since you are such a private person. I don't want that for you but again, I need closure and it seems that this is the only way since you don't want to sit down and talk.

I really urge you to consider sitting down and talking with me. Otherwise I reluctantly have no choice but to move forward with the lawsuit. They are planning to sue you for Breach of Contract, Fraud, Deceit, Concealment, Unjust Enrichment, and Willful Infliction of Emotional Distress. It really hurt when I saw the picture they painted of you in the complaint they drafted. The defense will be very costly. Do you really want to spend tens of thousands of dollars rather than spending some time to sit down and work through what's bothering the both of us?

I really urge you to take some time out of your schedule to sit down with me. Obviously I can't force you to do so and if you are so adamant about not speaking with me I'm out of options and that is unfortunate. If there is no friendship left to protect I need to move forward with the suit.

Please let me know if there is any chance you would consider sitting down with me to discuss. Meanwhile, while I will respect your boundary of not contacting you as you have finally told me, I am well within my right to pursue legal action. I'm very sorry for all of this.

Best,
Syed

On 5/14/19, 8:12 AM, "Elina Todorov" <etodorov1@gmail.com> wrote:

Thank you for the gifts, but I'd really appreciate if you respected my boundaries by not contacting me. As I've made it clear by my unresponsive behavior, I'm not happy with the way things ended and believe it would be best if we don't communicate or see each other. I'm planning to return the bag to the store this weekend (was out of town last weekend), but noticed there is no receipt for the earrings. If these gifts are conditional and you are expecting something from me in return with the intention of holding them over my head, please pick them up from my office and return them. I'll leave the box with the front desk.