

Exhibit 1

From: [Frazer Xia](#)
To: [Aaron Clouse](#)
Cc: [Jie Cao](#)
Subject: Re: Meet & Confer - Cao v. Polger et al. CV2019-055353
Date: Wednesday, January 29, 2020 1:44:00 PM

Mr. Clouse,

Carpenter, Hazlewood, Delgado & Bole, LLP. only filed with the court on Jan 3, 2020 to withdraw their representation on Polger and Quinn and this request was not granted by court till Jan 28, 2020. Furthermore, we have not received any communication from your firm until Jan 15, 2020. As a result, we can only recognize Carpenter, Hazlewood, Delgado & Bole, LLP. as the official counsel for Polger and Quinn, and all motions, requested filed by Michael Schern or your firm would not be valid at least before Jan 15, 2020.

Let me stress this again, now we are in a new court and we have to follow the new court's filing rules. The new court only requires to file a joint report rather than a joint notice. We have to let the new court know all the unresolved issues, including the active motions, requests and problematic minute entries.

Please clarify the following:

1. specifically who represent Michael Schern, is he still Pro Se or represented to you? We need to have counsel's names. As we can see from the court Docket, Michael Schern is still represented by himself.
2. specifically who represent Polger and Quinn? (names of counsels!)

We need to know the above in detail so we can know to whom we should send all future communications to.

If you wish to meet in person, you are welcome to visit Fountain Hills so we can meet at the City Hall or the library. We are all retired and are not feeling well to drive due to a series of events related to your client. My wife Jie is especially sick and has been on medication because the harm your client inflicted upon her.

BTW, utter ex-parte communication from Nov 20, 2019 to Jan 15, 2020 is not acting in good faith. In contrast, we sent ALL communications we filed with the court to all defendants. That's called a good faith.

Haining Xia

On Wed, Jan 29, 2020 at 1:15 PM Aaron Clouse <aclouse@srflawfirm.com> wrote:

Dear Jie Cao, Haining Xia, and Stone Xia:

Good Afternoon. The law firm of Schern Richardson Finter represents all Defendants in this matter. I direct your attention to the filings made by my firm on 12/18/19, 12/20/19, and 1/15/20. Each of those filings clearly indicates that my firm represents all of the defendants, and each of those filings clearly indicate in the top left corner of the first page thereof that I am one of the attorneys for the defendants. Furthermore, I have attached the Court's Order granting of the withdrawal of the law firm of Carpenter, Hazlewood, Delgado & Bole, LLP. The Order names the law firm of Schern Richardson Finter as attorneys of record for Defendants Polger and Quinn. The Order also specifically list my name as one of the attorneys of record.

I have now attempted in multiple emails to meet and confer with you regarding the matters the Court has directed us to in the Jan 24th Minute Entry. I will attempt one more time in good faith.

Can you please let me know if you are willing to address the following matters from my previous emails:

1. Are you represented by counsel in this matter as indicated in a draft of the Joint Report your provided me in previous email, and if so, please provide me their name and address?
2. Are you willing to file a Joint Notice identifying the outstanding motions before the Court to comply with the Jan 24th Minute Entry that has been provided to you in two previous emails?
3. Are you willing to meet and confer regarding the Joint Report to comply with the early meeting requirements of Rule 16 on Wednesday (2/5) or Thursday (2/6) of next week between the hours of 10:30am and 5:00pm? Please advise if those times work for you and what time would be best for you. I believe the time required to adequately address the items listed in Rule 16(c) will be between 45 minutes to one hour.

Like I mentioned in my previous email, I am more than willing to have an in person meeting to discuss the following issues. If anything, it would provide an opportunity for us to meet and move forward while working on this case.

Sincerely,

Aaron R. Clouse, Esq.

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From: Jie Cao <jiecao2008@gmail.com>

Sent: Tuesday, January 28, 2020 6:26 PM

To: Aaron Clouse <aclouse@srflawfirm.com>; Frazer Xia <frazierxia@gmail.com>

Subject: Re: Meet & Confer - Cao v. Polger et al. CV2019-055353

Mr. Clouse,

Please let us understand your role in this case. Whom do you represent? And since when? Our understanding is that Ms. Rudder's Motion to Withdraw, although filed on January 3, was never granted by Judge Campagnolo. If I may say so, even today, Rudder is the attorney for Polger and Quinn. Michael represented himself pro se according to the court docket.

We can't discuss this case further with you unless we understand your role in this.

Haining

On Tue, Jan 28, 2020 at 3:30 PM Aaron Clouse <aclouse@srflawfirm.com> wrote:

Dear Jie Cao, Haining Xia, and Stone Xia:

Good Afternoon. At this time, and pursuant to the Court's minute entry which I have now provided to you in two previous emails, the Court has ordered the parties to file a joint notice listing any outstanding motions. I understand from your email below that you want to file a Rule 16(c) joint report, in lieu of the joint notice listing outstanding motions as directed by the Court. Prior to filing the joint report, the parties are required to have an

early meeting in accordance with Rule 16(b). I am available for the required early meeting on Wednesday (2/5) or Thursday (2/6) of next week between the hours of 10:30 a.m. and 5:00 p.m.. Please advise if either of these dates work for you and what time would be best for you. I believe the time required to adequately address the items listed in Rule 16(c) will be between 45 minutes to one hour.

The joint notice listing outstanding motions is due on Monday February 3. Please reconsider your position on not wanting to file a Joint Notice of Outstanding Motion as outlined in the Court's Minute Entry. You are certainly welcome to file your own Notice of Outstanding Motions with the Court. Please advise us of your position, so that this office may file Defendants' Notice of Outstanding Motions to comply with the Court's Minute Entry.

Finally, per my previous email, can you please advise me whether you are represented by counsel, and if so, provide me with the name of your lawyer. Thank you.

Aaron R. Clouse, Esq.

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From: Jie Cao <jiecao2008@gmail.com>
Sent: Tuesday, January 28, 2020 2:27 PM
To: Aaron Clouse <aclouse@srflawfirm.com>; Frazer Xia <frazierxia@gmail.com>
Subject: Re: Meet & Confer - Cao v. Polger et al. CV2019-055353

Mr. Clouse,

We only saw a joint report on the website issued by the commercial court. Please refer to the link below. Since the case is now reassigned to the commercial court, we have to proceed with what the commercial court requires.

<https://superiorcourt.maricopa.gov/civil/commercial-court/>

In any event, we would like the new judge to be aware of the major issues starting from the beginning of the case. I think a joint report will provide more information to the Judge. To only list the outstanding motions will not be sufficient given the complexity of the case.

Haining Xia

On Tue, Jan 28, 2020 at 8:58 AM Aaron Clouse <aclouse@srflawfirm.com> wrote:

Dear Jie Cao, Haining Xia, and Stone Xia:

Good Morning. As you are probably already aware, the Court issued a minute entry dated January 24 and filed January 27, wherein the parties have been ordered to file a joint notice addressing outstanding motions. For your reference, a copy of the subject minute entry is attached to this email with the relevant language highlighted. Pursuant to the Court's order, the joint notice must be filed on or before Monday, February 3, 2020. While I am certainly open to having a phone call to discuss the outstanding motions and a draft of the required notice, I believe an in-person meeting may be more productive. Please respond to this email as soon as possible and let me know if you would like to meet in person at my office, or would prefer to have a phone call. Please include a few dates and times when you would be available for the discussion. I anticipate our discussion regarding the pending motions and draft of the required notice would not take more than 10-15 minutes. I look forward to hearing from you.

Sincerely,

Aaron R. Clouse, Esq.

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