

First Amended Complaint

Lewis -v- PB

Index No. 1556861/2019

# EXHIBIT 6

## Lewis' LA Counsel's Exchange with PB Partner Denver Edwards about the Sealed PB-NY Action Filings

*Entirety of the e-mail exchange between Terrence Jones (Lewis LA Counsel) and PB Partner concerning the sealed documents in the PB-NY Action. Edwards refuses to unseal and refuses to consent to seal.*

**Terrence@JonesOnLaw.com**

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**From:** Terrence@JonesOnLaw.com  
**Sent:** Thursday, August 29, 2019 5:33 AM  
**To:** 'Denver Edwards'  
**Subject:** RE: Pierce Bainbridge v. Don Lewis --- Sealed Documents

Denver,

I got your voicemail and will try to connect with you today.

We can agree to disagree with respect to the sealed documents' relevance to the claims in the California action. But given your unwillingness to agree to unsealing them, then, are you agreeable to stipulating to the filing of the documents under seal in the California action as well?

Please let me know your position and, if you are agreeable, I will prepare an appropriate stipulation.

Terrence

**TERRENCE JONES**

Attorney at Law

The Law Office of Terrence Jones, APC  
6737 Bright Avenue, Suite B6  
Whittier, California 90601

213.863.4490 | [Terrence@JonesOnLaw.com](mailto:Terrence@JonesOnLaw.com)

[www.JonesOnLaw.com](http://www.JonesOnLaw.com)



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**From:** Denver Edwards <dedwards@piercebainbridge.com>  
**Sent:** Wednesday, August 28, 2019 4:33 PM  
**To:** Terrence Jones <terrence@jonesonlaw.com>  
**Subject:** RE: Pierce Bainbridge v. Don Lewis --- Sealed Documents

Terrence,

You know that the filing in NY has nothing to do with the CA complaint and vice versa. Your note offers no legal (or other) reason to unseal the NY pleadings when you have yet to file a responsive pleading. I'm willing to discuss further and hear your arguments – I've just left you a voicemail at your office – but, without more, I decline your invitation to

unseal the NY pleadings. And as you must know your client sought to file a sur-reply in the NY litigation on the mistaken view that the court-directed filing on August 21 contained blockbuster information. The court summarily denied his request. Take notice.

**Denver G. Edwards, Partner**  
**Pierce Bainbridge Beck Price & Hecht LLP**

277 Park Avenue, 45th Floor  
New York, NY 10172  
O: (646) 661-1665 C: (201) 306-1090  
[dedwards@piercebainbridge.com](mailto:dedwards@piercebainbridge.com)

Boston | Cleveland | Los Angeles | **New York** | Washington, D.C.



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**From:** Terrence Jones <[terrence@jonesonlaw.com](mailto:terrence@jonesonlaw.com)>  
**Sent:** Wednesday, August 28, 2019 5:45 PM  
**To:** Denver Edwards <[dedwards@piercebainbridge.com](mailto:dedwards@piercebainbridge.com)>  
**Subject:** Pierce Bainbridge v. Don Lewis --- Sealed Documents

Denver,

As you know, last week, on August 21, 2018, we learned for the first time—from a reporter—about the papers Pierce Bainbridge filed under seal against Mr. Lewis in New York at 12:00 a.m. on May 15, 2019. We have reviewed the papers, and there is substantial overlap with PB’s public complaint in Los Angeles. Accordingly, we believe there is no reason, nor any “basis” for the papers to remain sealed; particularly the information that is already public. We are therefore seeking PB’s consent to a joint request to unseal the papers. Other than the previously undisclosed items from the Putney investigation report about the false accuser, this is not a close call. If we do not receive your consent by close of business tomorrow, Thursday August 29, we will assume you have rejected our request and will seek ex parte relief.

Terrence

**TERRENCE JONES**  
Attorney at Law

The Law Office of Terrence Jones, APC  
6737 Bright Avenue, Suite B6  
Whittier, California 90601

213.863.4490 | [Terrence@JonesOnLaw.com](mailto:Terrence@JonesOnLaw.com)

