

Paul Levy

From: Meghan Medacier <[REDACTED]@copycatlegal.com>
Sent: Friday, December 19, 2025 3:15 PM
To: Lorne Saeks
Cc: Herda, Amber L.; Jonathan P. Friedland; Paul Levy; Daniel DeSouza; Phil Malone; Adrienne Love
Subject: RE: [EXTERNAL] Rockefeller Photos, LLC v. National Law Forum, LLC d/b/a National Law Review/Case No. 1:25-CV-08045 [IMAN-MS1.FID646949]
Attachments: Rockefeller Photos v National Law Forum - Settlement Agreement.docx

Good afternoon,

Rockefeller agreed the juice wasn't worth the squeeze and agreed to accept the [REDACTED] with confidentiality. Attached is a draft that, to our knowledge, mirrors the final/signed version of the settlement agreement in Pool World.

Thank you.



Meghan Medacier, Esq.
Attorney

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From: Lorne Saeks <[REDACTED]@muchlaw.com>
Sent: Friday, December 5, 2025 4:10 PM
To: Daniel DeSouza <[REDACTED]@copycatlegal.com>; Meghan Medacier <[REDACTED]@copycatlegal.com>
Cc: Herda, Amber L. <[REDACTED]@kasdorf.com>; Jonathan P. Friedland <[REDACTED]@muchlaw.com>; Paul Levy <[REDACTED]@citizen.org>; Phil Malone <[REDACTED]@law.stanford.edu>; Adrienne Love <[REDACTED]@stearnsweaver.com>
Subject: RE: [EXTERNAL] Rockefeller Photos, LLC v. National Law Forum, LLC d/b/a National Law Review/Case No. 1:25-CV-08045 [IMAN-MS1.FID646949]

External (lsaeks@muchlaw.com)

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Dan, as I stated, my client's Rule 68 Offer of Judgement acceptance date has been extended to 12/8.

If your client wishes to not accept it but instead decides to propose a settlement agreement that provides for confidentiality of the amount of the settlement and for mutual releases, it should do so. I am advised my client would be agreeable to that if the dollar amount is [REDACTED] and the settlement agreement is substantively identical to the one signed in the Pool World case; my client has no interest in going back and forth negotiating that.

Lorne

From: Daniel DeSouza <[REDACTED]@copycatlegal.com>
Sent: Thursday, December 4, 2025 8:02 AM
To: Lorne Saeks <[REDACTED]@muchlaw.com>; Meghan Medacier <[REDACTED]@copycatlegal.com>
Cc: Herda, Amber L. <[REDACTED]@kasdorf.com>; Jonathan P. Friedland <[REDACTED]@muchlaw.com>; Paul Levy <[REDACTED]@citizen.org>; Phil Malone <[REDACTED]@law.stanford.edu>; Adrienne Love <[REDACTED]@stearnsweaver.com>
Subject: RE: [EXTERNAL] Rockefeller Photos, LLC v. National Law Forum, LLC d/b/a National Law Review/Case No. 1:25-CV-08045 [IMAN-MS1.FID646949]

Thanks. To clarify – is your client’s position that the Rule 68 offer must be accepted such that a judgment is actually entered against it or is it willing to enter into a confidential settlement agreement with releases etc.?

- Dan

From: Lorne Saeks <[REDACTED]@muchlaw.com>
Sent: Thursday, December 4, 2025 8:52 AM
To: Meghan Medacier <[REDACTED]@copycatlegal.com>; Daniel DeSouza <[REDACTED]@copycatlegal.com>
Cc: Herda, Amber L. <[REDACTED]@kasdorf.com>; Jonathan P. Friedland <[REDACTED]@muchlaw.com>; Paul Levy <[REDACTED]@citizen.org>; Phil Malone <[REDACTED]@law.stanford.edu>; Adrienne Love <[REDACTED]@stearnsweaver.com>
Subject: RE: [EXTERNAL] Rockefeller Photos, LLC v. National Law Forum, LLC d/b/a National Law Review/Case No. 1:25-CV-08045 [IMAN-MS1.FID646949]

Dan,
To follow up yesterday’s call, for the record Rockefeller Photo, LLC’s settlement offer of \$7,500 is rejected by my client. However, my client is willing to extend the Rule 68 Offer of Judgement acceptance date to December 8, 2025. A copy of the Rule 68 Offer of Judgment is hereby attached.
Thank you,
Lorne

From: Lorne Saeks
Sent: Tuesday, December 2, 2025 9:51 AM
To: Meghan Medacier <[REDACTED]@copycatlegal.com>
Cc: Herda, Amber L. <[REDACTED]@kasdorf.com>; Jonathan P. Friedland <[REDACTED]@muchlaw.com>; Paul Levy <[REDACTED]@citizen.org>; Phil Malone <[REDACTED]@law.stanford.edu>; Adrienne Love <[REDACTED]@stearnsweaver.com>; Daniel DeSouza <[REDACTED]@copycatlegal.com>
Subject: Re: [EXTERNAL] RE: Rockefeller Photos, LLC v. National Law Forum, LLC d/b/a National Law Review/Case No. 1:25-CV-08045 [IMAN-MS1.FID646949]

Meghan
Tomorrow at 2 pm EST works for me.
Please call my direct dial. 312 521 2438.
Thanks
Lorne
Sent from my iPhone

On Dec 2, 2025, at 9:30 AM, Meghan Medacier <[REDACTED]@copycatlegal.com> wrote: