

HAUG PARTNERS

Haug Partners LLP
745 Fifth Avenue, 10th Floor
New York, NY 10151
+1.212.588.0800 Main
haugpartners.com

May 15, 2018

Via Email

Porter F. Fleming
pffleming@haugpartners.com

Stephen M. Lobbin, Esq.
Foundation Law Group LLP
888 Prospect Street
La Jolla, California 92037

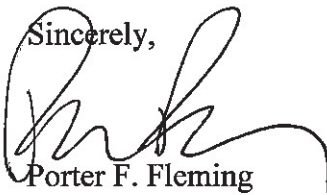
Re: *LCS Group, LLC v. Shire LLC, et al.*, Case No. 1:18-cv-02688-AT

Dear Mr. Lobbin:

We have reviewed your May 7th correspondence. Your letter does not comply with Judge Torres's individual rules of practice, which required you to, among other things, provide "the amendments, if any, to be made to the complaint to address [the deficiencies raised]" In particular, despite receiving an extension to respond, your letter fails to provide the actual amendments "to be made," and instead makes reference to undisclosed "further factual allegations."

It has been nearly three weeks since our April 26th letter, which detailed the deficiencies in LCS Group's Complaint and explained that each of LCS' claims must be dismissed. As your May 7th letter does not adequately address or resolve the issues we raised, we intend to submit a letter to the Court on May 21st to seek dismissal of the case. To the extent LCS intends to revise its complaint, please provide us with your amendments by no later than 5:00 p.m. EDT on Friday, May 18th.

Sincerely,



Porter F. Fleming