

**dagrella@lawyer.com**

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**From:** dagrella@lawyer.com  
**Sent:** Tuesday, January 14, 2025 10:38 AM  
**To:** 'Jonathan.Goldstein@gtlaw.com'  
**Cc:** 'Jennifer.Cooper@gtlaw.com'  
**Subject:** RE: Dagrella v. Samsung Electronics America, Inc. Riverside County Case No. CVCO2405948

Agreed, and congrats!

**Jerry R. Dagrella**

Dagrella Law Firm, P.C.  
1001 Wilshire Blvd., Suite 2288  
Los Angeles, CA 90017  
Phone: 714-292-8249  
[www.dagrella.com](http://www.dagrella.com)

---

**From:** Jonathan.Goldstein@gtlaw.com <Jonathan.Goldstein@gtlaw.com>  
**Sent:** Tuesday, January 14, 2025 10:22 AM  
**To:** dagrella@lawyer.com  
**Cc:** Jennifer.Cooper@gtlaw.com  
**Subject:** RE: Dagrella v. Samsung Electronics America, Inc. Riverside County Case No. CVCO2405948

Jerry,

I need some more time to obtain the information necessary to serve discovery responses, particularly in light of the disruption caused by the fires. Can we agree to extend SEA's deadline to serve responses to the document requests and form interrogatories you served on SEA from January 17, 2025 to January 31, 2025?

Also, I will be taking parental leave soon and my colleague Jenn Cooper, cc'd here, will be taking over this case while I am out. After January 25, 2025, please direct all correspondence to her.

Thank you,  
Jonathan

**Jonathan Goldstein**  
Associate

Greenberg Traurig, LLP  
1840 Century Park East | Suite 1900 | Los Angeles, CA 90067-2121  
T +1 310.586.7851 | F +1 310.583.7800  
[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com) | [View GT Biography](#)



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**From:** [dagrella@lawyer.com](mailto:dagrella@lawyer.com) <[dagrella@lawyer.com](mailto:dagrella@lawyer.com)>  
**Sent:** Wednesday, December 18, 2024 3:37 PM  
**To:** Goldstein, Jonathan (Assoc-LA-LT) <[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com)>  
**Subject:** RE: Dagrella v. Samsung Electronics America, Inc. Riverside County Case No. CVCO2405948

Yes, I consent to e-service of all documents.

FYI... I received the attached voicemail from an unidentified caller associated with "Post Final Mile" at Samsung. The voicemail did not include a callback number, and the caller ID displayed a generic number linked to Samsung's home delivery service. Given the pending lawsuit, I'm disregarding the message, as I should not engage directly with your client.

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---

**From:** [Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com) <[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com)>  
**Sent:** Wednesday, December 18, 2024 3:03 PM  
**To:** [dagrella@lawyer.com](mailto:dagrella@lawyer.com)  
**Subject:** RE: Dagrella v. Samsung Electronics America, Inc. Riverside County Case No. CVCO2405948

Thank you. Can we also agree on e-service of documents in this case?

**Jonathan Goldstein**  
Associate

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[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com) | [View GT Biography](#)

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**From:** Jerry Dagrella <[dagrella@lawyer.com](mailto:dagrella@lawyer.com)>  
**Sent:** Wednesday, December 18, 2024 3:01 PM  
**To:** Goldstein, Jonathan (Assoc-LA-LT) <[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com)>  
**Subject:** Re: Dagrella v. Samsung Electronics America, Inc. Riverside County Case No. CVCO2405948

Not a problem. I suspect most people would prefer to minimize their workload during the holiday season.

Jerry R. Dagrella  
[www.dagrella.com](http://www.dagrella.com)

Sent from my iPhone

On Dec 18, 2024, at 2:25 PM, [Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com) wrote:

Jerry,

I can confirm that we will file an amended answer this Friday, December 20.

Can we agree to extend SEA's deadline to serve responses to the document requests and form interrogatories you served on SEA from December 23, 2024 to January 17, 2025? I need some more information from SEA to finalize the responses and the individual with that knowledge will be out of the office on PTO for the next few weeks.

Appreciate your professional courtesy,

Jonathan

**Jonathan Goldstein**  
Associate

Greenberg Traurig, LLP  
1840 Century Park East | Suite 1900 | Los Angeles, CA 90067-2121  
T +1 310.586.7851 | F +1 310.583.7800  
[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com) | [View GT Biography](#)

<image001.png>

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**From:** Goldstein, Jonathan (Assoc-LA-LT)  
**Sent:** Wednesday, December 11, 2024 11:54 AM  
**To:** 'dagrella@lawyer.com' <[dagrella@lawyer.com](mailto:dagrella@lawyer.com)>  
**Subject:** RE: Dagrella v. Samsung Electronics America, Inc. Riverside County Case No. CVCO2405948

Yes, you're right. We'll try to file the answer by next Friday, December 20. If we need more time, I will let you know by that date. Please confirm the other extensions in my email.

**Jonathan Goldstein**  
Associate

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[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com) | [View GT Biography](#)

<image001.png>

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**From:** [dagrella@lawyer.com](mailto:dagrella@lawyer.com) <[dagrella@lawyer.com](mailto:dagrella@lawyer.com)>  
**Sent:** Wednesday, December 11, 2024 11:30 AM  
**To:** Goldstein, Jonathan (Assoc-LA-LT) <[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com)>  
**Subject:** RE: Dagrella v. Samsung Electronics America, Inc. Riverside County Case No. CVCO2405948

My recollection is that you were aiming to file the Answer by next. If my demurrer is due the same day as your Amended Answer, and you fail to file one, then I will not know to do a demurrer to the original Answer until it is too late.

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**From:** [Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com) <[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com)>  
**Sent:** Wednesday, December 11, 2024 11:23 AM  
**To:** [dagrella@lawyer.com](mailto:dagrella@lawyer.com)  
**Subject:** RE: Dagrella v. Samsung Electronics America, Inc. Riverside County Case No. CVCO2405948

Jerry,

Thank you for the call earlier. As discussed, SEA will file an amended answer, which we aim to do by December 23, 2024. If for some reason we need more time, we will let you know. You also agreed that if SEA needed to amend its answer at a later date, you would not unreasonably oppose that amendment.

Accordingly, we agreed to extend SEA's time to file an amended answer and your time to file a demurrer to the answer to December 23, 2024. We also agreed to extend SEA's deadline to serve responses to the document requests and form interrogatories you served on SEA to December 23, 2024.

Jonathan

**Jonathan Goldstein**  
Associate

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T +1 310.586.7851 | F +1 310.583.7800  
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**From:** [dagrella@lawyer.com](mailto:dagrella@lawyer.com) <[dagrella@lawyer.com](mailto:dagrella@lawyer.com)>  
**Sent:** Wednesday, December 11, 2024 10:22 AM  
**To:** Goldstein, Jonathan (Assoc-LA-LT) <[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com)>  
**Subject:** RE: Dagrella v. Samsung Electronics America, Inc. Riverside County Case No. CVCO2405948

Wil do

**Jerry R. Dagrella**  
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**From:** [Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com) <[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com)>  
**Sent:** Wednesday, December 11, 2024 10:13 AM  
**To:** [dagrella@lawyer.com](mailto:dagrella@lawyer.com)  
**Subject:** RE: Dagrella v. Samsung Electronics America, Inc. Riverside County Case No. CVCO2405948

Great, please call my office line then. 310 586 7851.

**Jonathan Goldstein**

Associate

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**From:** Jerry Dagrella <[dagrella@lawyer.com](mailto:dagrella@lawyer.com)>

**Sent:** Tuesday, December 10, 2024 8:55 PM

**To:** Goldstein, Jonathan (Assoc-LA-LT) <[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com)>

**Cc:** Herrington, Robert J. (Shld-LA-LT) <[Robert.Herrington@gtlaw.com](mailto:Robert.Herrington@gtlaw.com)>

**Subject:** Re: Dagrella v. Samsung Electronics America, Inc. Riverside County Case No. CVC02405948

Let's do 11am tomorrow

Jerry R. Dagrella

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

Sent from my iPhone

On Dec 10, 2024, at 8:29 PM, [Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com) wrote:

Jerry,

I am free between 11 am and 1 pm tomorrow. Please let me know if that works for you.

**Jonathan Goldstein**

Associate

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[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com) | [View GT Biography](#)

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**From:** [dagrella@lawyer.com](mailto:dagrella@lawyer.com) <[dagrella@lawyer.com](mailto:dagrella@lawyer.com)>  
**Sent:** Tuesday, December 10, 2024 6:01 PM  
**To:** Goldstein, Jonathan (Assoc-LA-LT) <[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com)>  
**Cc:** Herrington, Robert J. (Shld-LA-LT) <[Robert.Herrington@gtlaw.com](mailto:Robert.Herrington@gtlaw.com)>  
**Subject:** RE: Dagrella v. Samsung Electronics America, Inc. Riverside County Case No. CVCO2405948

Jonathan,

What time tomorrow are you available to discuss the Answer?

**Jerry R. Dagrella**  
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**From:** [dagrella@lawyer.com](mailto:dagrella@lawyer.com) <[dagrella@lawyer.com](mailto:dagrella@lawyer.com)>  
**Sent:** Tuesday, November 19, 2024 12:23 PM  
**To:** 'Jonathan.Goldstein@gtlaw.com' <[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com)>  
**Cc:** 'Robert.Herrington@gtlaw.com' <[Robert.Herrington@gtlaw.com](mailto:Robert.Herrington@gtlaw.com)>  
**Subject:** RE: Dagrella v. Samsung Electronics America, Inc. Riverside County Case No. CVCO2405948

That sounds awful. I had a trial last year that began before and continued after the Thanksgiving break – made the holidays a bit challenging.

Let's catch up on December 11.

**Jerry R. Dagrella**  
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**From:** [Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com) <[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com)>  
**Sent:** Tuesday, November 19, 2024 11:59 AM  
**To:** [dagrella@lawyer.com](mailto:dagrella@lawyer.com)  
**Cc:** [Robert.Herrington@gtlaw.com](mailto:Robert.Herrington@gtlaw.com)  
**Subject:** RE: Dagrella v. Samsung Electronics America, Inc. Riverside County Case No. CVCO2405948

Jerry,

I have the opposite problem of my trial being extended through December 10. Can we discuss on December 11?

**Jonathan Goldstein**

Associate

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**From:** Jerry Dagrella <[dagrella@lawyer.com](mailto:dagrella@lawyer.com)>

**Sent:** Monday, November 18, 2024 6:13 PM

**To:** Goldstein, Jonathan (Assoc-LA-LT) <[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com)>

**Cc:** Herrington, Robert J. (Shld-LA-LT) <[Robert.Herrington@gtlaw.com](mailto:Robert.Herrington@gtlaw.com)>

**Subject:** Re: Dagrella v. Samsung Electronics America, Inc. Riverside County Case No. CVCO2405948

Jonathan,

My trial was continued to July 2025. Let me know when you're available to discuss the Answer. Thanks.

Jerry R. Dagrella

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

Sent from my iPhone

On Nov 14, 2024, at 11:36 AM, Jerry Dagrella <[dagrella@lawyer.com](mailto:dagrella@lawyer.com)> wrote:

Thank you. Look forward to discussing and resolving the issues with the Answer when we're both out of trials.

Jerry R. Dagrella

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

Sent from my iPhone



On Nov 14, 2024, at 11:26 AM, [Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com) wrote:

Mr. Dagrella,

We agree to a 30-day extension for you to file a demurrer or motion to strike against the Answer and for Samsung Electronics America, Inc. (SEA) to file an amended Answer as a matter of right, if after meeting and conferring, SEA agrees to do so.

By my calculation, SEA's deadline to file an amended answer and your deadline to file a demurrer or motion to strike are now December 18, 2024. Please let me know if you have a different understanding.

Jonathan

**Jonathan Goldstein**  
Associate

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**From:** [dagrella@lawyer.com](mailto:dagrella@lawyer.com) <[dagrella@lawyer.com](mailto:dagrella@lawyer.com)>  
**Sent:** Thursday, November 14, 2024 10:30 AM  
**To:** Goldstein, Jonathan (Assoc-LA-LT) <[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com)>  
**Cc:** Herrington, Robert J. (Shld-LA-LT) <[Robert.Herrington@gtlaw.com](mailto:Robert.Herrington@gtlaw.com)>  
**Subject:** RE: Dagrella v. Samsung Electronics America, Inc. Riverside County Case No. CVCO2405948

Jonathan,

Coincidentally, I am in trial in San Bernardino starting Monday.

I propose that we agree to a 30-day extension for filing a demurrer or motion to strike against the Answer. This extension aligns with the automatic extension provisions

under California Code of Civil Procedure § 430.41(b), which applies when the parties are unable to meet and confer within the designated timeframe.

Let me know if the 30-day extension is acceptable, and we can put this off until you have had an opportunity to fully review my letter.

**Jerry R. Dagrella**

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**From:** [Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com) <[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com)>  
**Sent:** Thursday, November 14, 2024 10:02 AM  
**To:** [dagrella@lawyer.com](mailto:dagrella@lawyer.com)  
**Cc:** [Robert.Herrington@gtlaw.com](mailto:Robert.Herrington@gtlaw.com)  
**Subject:** RE: Dagrella v. Samsung Electronics America, Inc. Riverside County Case No. CVCO2405948

Mr. Dagrella,

I have received your letter. I am in trial this week. Can we meet and confer early next week? I will agree to extend your deadline to file a demurrer so we can meet and confer next week.

Jonathan

**Jonathan Goldstein**  
Associate

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**From:** [dagrella@lawyer.com](mailto:dagrella@lawyer.com) <[dagrella@lawyer.com](mailto:dagrella@lawyer.com)>  
**Sent:** Tuesday, November 12, 2024 12:12 PM  
**To:** Goldstein, Jonathan (Assoc-LA-LT) <[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com)>

**Cc:** Herrington, Robert J. (Shld-LA-LT) <[Robert.Herrington@gtlaw.com](mailto:Robert.Herrington@gtlaw.com)>

**Subject:** RE: Dagrella v. Samsung Electronics America, Inc. Riverside County Case No. CVCO2405948

**\*EXTERNAL TO GT\***

Jonathan,

Your client's Answer requires amendment as it contains numerous irrelevant, boilerplate affirmative defenses. For cost efficiency, I recommend you file an amended Answer, so we can avoid unnecessary motion practice and associated costs. Given the applicable fee statute, increased litigation costs would not benefit Samsung, as attorney's fees are recoverable in this matter. While I am appearing pro per, I have retained counsel assisting with filings.

Please review the attached letter for details.

**Jerry R. Dagrella**

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1001 Wilshire Blvd., Suite 2288  
Los Angeles, CA 90017  
Phone: 714-292-8249  
[www.dagrella.com](http://www.dagrella.com)

---

**From:** [dagrella@lawyer.com](mailto:dagrella@lawyer.com) <[dagrella@lawyer.com](mailto:dagrella@lawyer.com)>

**Sent:** Tuesday, November 5, 2024 3:30 PM

**To:** 'Jonathan.Goldstein@gtlaw.com' <[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com)>

**Subject:** RE: Dagrella v. Samsung Electronics America, Inc. Riverside County Case No. CVCO2405948

Confirmed.

**Jerry R. Dagrella**

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Los Angeles, CA 90017  
Phone: 714-292-8249  
[www.dagrella.com](http://www.dagrella.com)

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**From:** [Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com) <[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com)>  
**Sent:** Tuesday, November 5, 2024 3:05 PM  
**To:** [dagrella@lawyer.com](mailto:dagrella@lawyer.com)  
**Subject:** Dagrella v. Samsung Electronics America, Inc. Riverside County Case No. CVCO2405948

Mr. Dagrella,

Thank you for taking my call earlier. I am confirming the extension of time to December 2, 2024 for Samsung Electronics America, Inc. (SEA) to respond to the First Set of Requests for Production and First Set of Form Interrogatories you propounded on SEA, which we agreed to on our call.

Best,  
Jonathan

**Jonathan Goldstein**  
Associate

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T +1 310.586.7851 | F +1 310.583.7800  
[Jonathan.Goldstein@gtlaw.com](mailto:Jonathan.Goldstein@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com) | [View GT Biography](#)

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