

ROY DEN HOLLANDER
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January 8, 2016

Dominick Olivo
Director of Sales and Marketing
Select Office Suites
1115 Broadway, 12th Floor
New York, N.Y. 10010

Dear Mr. Olivo:

According to Loly Mendez, Office Manager, you submitted to my employer, Epiq Systems, a false written statement called an “incident report” by which you clearly intended to have me fired.

Your statements were based on the intentional lies, prevarications and dissemblings of one of your employees, apparently one of many who have not been vetted for working through the federal government’s e-Verify System.

The publication of those statements from your employee to a third party, Epiq, makes you liable for defamation, injurious falsehoods, interfering with an economic advantage—my employment contract with Epiq, and age discrimination since I am 68 years old.

If you refuse to withdraw that incident report, I will have no choice but to sue in order to protect my reputation and ability to work as a lawyer. The suit will not only be against you personally, but will include “John Doe” as a defendant who is your employee. Discovery will, of course, reveal his real name and whether he is lawfully allowed to work in the United States.

The choice is yours. If I do not hear back from you by January 19, 2016, then I will have no choice but to fight for my rights against you and your employee in court.

Thank you for your time.

Sincerely,

/S/

Roy Den Hollander

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January 12, 2016

Steven A. Newborn, Esq.
Weil, Gotshal & Manges-Antitrust Section
1300 Eye St NW #900
Washington, DC 20005

Dear Mr. Newborn:

I am a 68 year-old attorney, once an associate of Cravath, whose procedural due process rights were violated by the company Weil is using to do document review in the Staples antitrust case.

Epiq Systems has 60 lawyers working in a make-shift office on the roof-top of 1115 Broadway, New York City. The so-called “penthouse” is accessible only by one flight of steep, narrow stairs that are part of the building’s fire escape stairwell. If a fire were to occur, 60 attorneys would have to cram through one exit (there are suppose to be two), then proceed across a wooden deck on the roof by way of a narrow hallway partly opened to the elements, then through another doorway into the fire stairwell, down the stairs hoping not to be pushed through the window on the 12th floor that is directly at the bottom of the flight of stairs.

In addition, the attorneys have to bundle up in their winter coats and sweaters because the temperature in the penthouse is often very cold.

While working in this environment, a dispute occurred between a young, muscular member of the landlord’s maintenance crew and myself. The maintenance member committed a minor battery, but still a battery, on me to which I replied, “Watch it illegal.” The maintenance member complained to Dominick Olivo, the landlord’s manager, and he filed an “Incident Report” with Epiq Systems.

Karen Herckis of Epiq contacted me requesting my side of the story that I had already told to Epiq’s Patrick Gallagher. (Ex. A). I requested a copy of the allegations against me contained in the “Incident Report” (Ex. B), but she refused, saying it was an internal document of the landlord, Select Office Suites. (Ex. C). Of course, if it was an internal document of the landlord, then what was she doing with it. I responded that my attorney advised me to refrain from discussing the matter until we determined whether it was necessary to bring a case against the landlord’s manager and the employee. (Ex. D). Ms. Herckis then summarily fired me. (Ex. E).

I understand that procedural due process only applies to governments, but when the founding fathers added the Fifth Amendment, it was an expression of the societal belief in fair play—that a person has the right to review the allegations against him. Epiq acts otherwise.

Thank you for your time.

Sincerely,

/S/

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January 25, 2016

Ron Sargent, CEO
500 Staples Dr (Crossing Blvd)
Framingham, MA 01702

Dear Mr. Sargent:

I am a 68 year-old attorney whose procedural due process rights were violated by the company that your attorneys at Weil, Gotshal & Manges hired to do document review in the Staples and FTC antitrust case currently pending in the U.S. District Court in Washington, D.C.

Epiq Systems has 60 lawyers working in a make-shift office next to the building's water tower on the roof-top of 1115 Broadway, New York City. The so-called "penthouse" is accessible only by one flight of steep, narrow stairs that are part of the building's fire escape stairwell. If a fire were to occur, 60 attorneys would have to cram through one exit (there are suppose to be two), then proceed across a wooden deck on the roof by way of a narrow wooden hallway partly opened to the elements, then through another doorway into the fire stairwell, down the stairs hoping not to be pushed through the window on the 12th floor that is directly at the bottom of the flight of stairs.

In addition, the attorneys have to bundle up in their winter coats and sweaters because the temperature in the penthouse is often very cold with the result of making the accuracy of the review work suspect.

While working in this environment, a dispute occurred between a young, muscular member of the landlord's maintenance crew and myself. The maintenance member committed a minor battery, but still a battery, on me to which I replied, "Watch it illegal." The maintenance member complained to Dominick Olivo, the landlord's manager, and he filed an "Incident Report" with Epiq Systems.

Karen Herckis of Epiq contacted me requesting my side of the story that I had already told to Epiq's Patrick Gallagher. (Ex. A). I requested a copy of the allegations against me contained in the "Incident Report" (Ex. B), but she refused, saying it was an internal document of the landlord, Select Office Suites. (Ex. C). Of course, if it was an internal document of the landlord, then what was she doing with it. I responded that my attorney advised me to refrain from discussing the matter until we determined whether it was necessary to bring a case against the landlord's manager and the employee. (Ex. D). Ms. Herckis then summarily fired me. (Ex. E).

I understand that procedural due process only applies to governments, but when the founding fathers added the Fifth Amendment, it was an expression of the societal belief in fair play—that a person has the right to review the allegations against him. Epiq, which Staples ultimately pays, acts otherwise.

As such, I have filed a case in the New York City Civil Court, No. 000854 cv 2016, against Epiq Systems, Dominick Olivo and the illegal alien whose name I do not yet know.

Thank you for your time.

Sincerely,

/S/

Roy Den Hollander