



Attorneys at Law  
1270 Avenue of the Americas  
24th Floor

New York, New York 10020  
Telephone: 212-492-2500  
Facsimile: 212-492-2501  
www.ogletree.com

Kimberly R. Karseboom  
(212) 492-2078  
kimberly.karseboom@ogletree.com

June 5, 2026

**VIA ECF**

Hon. Jesse M. Furman  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

Re: *Mphasis Corporation v. Albert Rojas*  
Civil Action No. 25-03175

Dear Judge Furman:

We represent Plaintiff Mphasis Corporation (“Mphasis”) in the above-referenced matter. The Court’s Order dated May 29, 2026 instructed the parties to each file a letter proposing next steps for the litigation of this matter.

The only causes of action that currently exist in this case are Mphasis’ claims against Albert Rojas (“Rojas”). Rojas, despite multiple opportunities offered by Judge Wang to do so, has not identified an operative Answer in this case, nor has he asserted valid cross claims. At Judge Furman’s direction, the parties attended a settlement conference with Magistrate Judge Sarah Netburn on May 28, 2026. However, at the conference, Rojas insisted that Mphasis must pay him a settlement for his termination from Mphasis in February 2025. Anticipating Rojas’ position, Your Honor assigned *pro se* counsel, Susanne Toes Keane, to assist with the settlement. Unfortunately, despite Ms. Keane’s efforts, Rojas could not be swayed to accept the posture of the case, which is that Rojas is being sued for damages caused by his intentional behavior.

At this time, Mphasis requests that Your Honor rule on Judge Wang’s Report & Recommendation that Rojas be held in contempt, his answer, to the extent there is one filed on the docket, be stricken, monetary sanctions be granted against Rojas, and Mphasis be granted attorney’s fees and costs.

Since the de novo contempt hearing on March 12, 2026, Mphasis counsel has appeared in Court on two separate occasions: (1) to facilitate the forensic imaging of Rojas’ personal laptop; and (2) for the settlement conference. Had Rojas complied with the forensic imaging initially, Mphasis

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would have avoided wasting thousands of dollars on attorney's fees and the costs of arranging imaging for the second time. However, even after a sanction against Rojas was entered by Judge Wang in 2025 for his willful disobedience of the Court's imaging order, Rojas still insisted on complicating and obstructing the forensic imaging again, writing through email and docket filings of his intention to restrict the imaging scope unilaterally. As a result, Mphasis counsel again moved to compel Rojas' compliance to avoid another imaging fee wasted. Judge Furman was forced to enter another imaging order on March 30, 2026. Mphasis counsel filed another electronic device form and attended the imaging at the Courthouse, resulting in additional fees and costs.

On April 6, 2026, Judge Furman directed the parties to participate in a settlement conference with Judge Netburn, which was scheduled for May 29 and ultimately held on May 28. Prior to the conference, Rojas, despite having counsel for the purposes of settlement, repeatedly emailed Mphasis' counsel demanding 5 years of compensation from Mphasis for his termination. Mphasis' counsel reiterated to Rojas that he was being sued for damages and Mphasis would not be paying damages to Rojas in this matter. Mphasis' counsel also presented concerns that the settlement conference would not be fruitful given Rojas' posture, again concerned about wasting the client's money.

On May 28, Mphasis attended the settlement conference in good faith and prepared to negotiate a resolution. Rojas did not appear in good faith, refusing to accept the procedural, factual, and legal obstacles with his position, yet another example of his obstinance in the face of the practicalities of this matter.

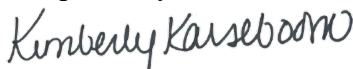
The only effective relief from Rojas' conduct during this litigation has been monetary sanctions. It is Mphasis' position that the only way to move this case forward constructively is to proceed with a ruling on the Report & Recommendation of Judge Wang and hold Rojas in contempt, striking his answer and setting a date for an inquest. Mphasis is seeking a permanent injunction against Rojas awarding sanctions for any violations the following conduct:

1. Using Mphasis or QBE as a domain name for a website;
2. Impersonating an employee of Mphasis or QBE;
3. Using "spoof" email addresses with Mphasis or QBE in the domain name;
4. Contacting Mphasis or QBE employees; or
5. Disparaging Mphasis or QBE.

Finally, Mphasis assumes that Judge Furman's Order dated April 26, 2026 directing the parties to file a joint status letter by June 6, 2026 is rendered moot by the submission of the parties' individual status letters.

We thank the Court for its consideration of this matter.

Respectfully submitted,



Kimberly R. Karseboom