

Jennifer M. Davy

From: Jennifer Cowan
Sent: Wednesday, March 17, 2010 11:49 AM
To: Jennifer M. Davy
Subject: FW: TE- Discovery Re

From: Zachary Ross [mailto:zross@kirkpinkerton.com]
Sent: Wednesday, March 17, 2010 11:48 AM
To: Jennifer Cowan
Subject: RE: TE- Discovery Re

Jenn,

The only thing I want to add to your statement below as clarification is that you want whatever documents Scott has at his office. You are not requiring him to provide documents that are kept at the District Office.

Zac

		
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From: Jennifer Cowan [mailto:jcowan@llw-law.com]
Sent: Tuesday, March 16, 2010 9:05 AM
To: Zachary Ross
Subject: RE: TE- Discovery Re

Yes, and per our conversation on Friday, you intend to go forward with Scott's deposition on Friday and provide all documents in responsive to our duces tecum request that have been not previously been produced. Further, to the extent you believe a document is privileged, you will be providing a privilege log of those documents at Scott's deposition.

