

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISION**

**DALE STROUD and
KARI STROUD**

PLAINTIFFS

v.

No. 4:12-cv-500-DPM

**SOUTHWESTERN ENERGY
COMPANY and SEECO, INC.**

DEFENDANTS

ORDER

The Court received the attached letter from the Defendants' counsel. There's no need for the Defendants to retain an e-discovery consultant for the upcoming hearing. Ms. Blythe can speak for them on these issues.

So Ordered.



D.P. Marshall Jr.
United States District Judge

27 July 2018

July 25, 2018

Via Email

Honorable Judge D.P. Marshall Jr.
U.S. District Court for the
Eastern District of Arkansas
600 W. Capitol Ave., Room B149
Little Rock, Arkansas 72201

Re: Robbie and Gwenna Hill, et al. v. Southwestern Energy Company, et al.;
Docket No. 4:12-CV-00500-DPM; in the United States District Court for
the Eastern District of Arkansas

Dear Judge Marshall:

On behalf of Defendants SEECO, Inc. and Southwestern Energy Company (collectively, "Defendants"), this letter requests clarification on procedural matters related to the August 10, 2018 hearing. Your Honor's Order setting the hearing states that "[t]he parties' e-discovery consultants must attend . . ." Order dated May 18, 2018 (Dkt. #260) at 1. As Your Honor is aware, I have been advising Defendants on issues related to e-discovery in this litigation. Thus, Defendants have not retained a separate e-discovery consultant.

I have advised clients on e-discovery issues for over fifteen years. In 2010, I was nominated to be a member of The Sedona Conference's Working Group 1 on Electronic Document Retention and Production and I have been involved in Sedona's development of guidelines and best practices for e-discovery since that time.

As a part of my e-discovery practice, I have worked with Defendants on this litigation and numerous other cases since 2011 and I am very familiar with their employees, record management systems, and information including email. I will be fully prepared to answer Your Honor's questions at the hearing on the search terms proposed by Plaintiffs. I am knowledgeable on the issues in this case as well as the information that Defendants have in their possession, custody or control relevant to those issues.

Please confirm whether my participation in the August 10, 2018 hearing complies with the Order or whether Defendants are required to retain a consultant specifically for purposes of the hearing. Please let me know if I can provide any further information.

July 25, 2018
Page 2

Respectfully yours,



Michele R. Blythe

cc: Timothy R. Holton [via Email]
John R. Holton
HOLTON LAW FIRM, PLLC
296 Washington Avenue
Memphis, Tennessee 38103

Michael P. McGartland [via Email]
MCGARTLAND LAW FIRM, PLLC
1300 South University Drive
Suite 500
Fort Worth, Texas 76107

Michael D. Morfey [via Email]
HUNTON ANDREWS KURTH LLP
600 Travis, Suite 4200
Houston, Texas 77002

G. Alan Perkins [via Email]
James D. Rankin, III
PPGMR LAW, PLLC
101 Morgan Keegan Dr., Suite A
Little Rock, Arkansas 72202

July 25, 2018
Page 3

bcc: Billy D. Dixon, Esq. [*via* Email]
Southwestern Energy Company
10000 Energy Drive
Spring, Texas 77389