

EXHIBIT "I"

Parker, Crystal

From: Patricia L. Peden [ppeden@pedenlawfirm.com]
Sent: Tuesday, May 12, 2009 9:23 PM
To: Babcock, Chip
Cc: 'Nick Patton'; Parker, Crystal; gpc@texarkanalaw.com
Subject: Ward deposition
Follow Up Flag: Follow up
Due By: Wednesday, June 03, 2009 12:00 AM
Flag Status: Red

Chip:

I reviewed your April 23, 2009 letter concerning depositions in the Ward case. I will get back to you soon with dates for both John Ward, Jr. and Nell Cooley Ward. We are going to have an issue with you asking John Ward or his wife about tax returns, financial information, medical information and other highly private matters that have no relevance to the issues in this case and for which you were denied discovery in the Albritton case. If we can agree that you won't ask those questions of Johnny or his wife, we have no problem offering dates. If, however, you plan to ask those questions, we will instruct the witness not to answer and will seek a protective order, if necessary. Let me know how you would like to proceed.

I am also in receipt of the discovery letters you sent today. I will respond to them as soon as possible, but it is unlikely that I will be able to do so before next Tuesday.

Regards,
Patty

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September 11, 2009

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bcc: Bruce Pottash
Joseph Jerome

C. Babcock
N. Hamilton
A. Bush
K. Adair