

Patricia L. Peden

From: Parker, Crystal [cparker@jw.com]
Sent: Tuesday, December 01, 2009 12:48 PM
To: Patricia L. Peden; Babcock, Chip; Nick Patton; jh@jamesholmeslaw.com
Cc: Griffin, Richard; Moran, David; Schwarz, Kurt; Flynn-DuPart, Mary Lou; Adair, Kathy
Subject: RE: Deposition of Chuck Herring

He has scheduling conflicts.

Crystal J. Parker
Jackson Walker L.L.P.
713-752-4217

From: Patricia L. Peden [mailto:ppeden@pedenlawfirm.com]
Sent: Tuesday, December 01, 2009 2:40 PM
To: Parker, Crystal; Babcock, Chip; 'Nick Patton'; jh@jamesholmeslaw.com
Cc: Griffin, Richard; Moran, David; Schwarz, Kurt; Flynn-DuPart, Mary Lou; Adair, Kathy
Subject: RE: Deposition of Chuck Herring

Crystal:

I responded three business days after receiving your email—hardly an unreasonable delay given that I was out of the office preparing for and attending depositions in this case two of those days. Your response: “I would also imagine that he is taking some time off for the holiday” suggests that you don’t know that there is an actual conflict with Mr. Herring’s schedule. And, while I understand taking time off for the holidays, that does not explain not giving us deposition dates until mid-January. Please let me know specifically why it is that Mr. Herring’s deposition cannot go forward on the 16th. What is the specific conflict? Also, please let me know why he is not available for deposition until mid-January.

Thanks,
Patty

From: Parker, Crystal [mailto:cparker@jw.com]
Sent: Tuesday, December 01, 2009 12:22 PM
To: Babcock, Chip; Patricia L. Peden; Nick Patton; jh@jamesholmeslaw.com
Cc: Griffin, Richard; Moran, David; Schwarz, Kurt; Flynn-DuPart, Mary Lou; Adair, Kathy
Subject: RE: Deposition of Chuck Herring

Mr. Herring has a very full schedule as I advised you earlier. That is why I asked that you get back with me right away about dates. I didn't hear from you for almost a week. I would also imagine that he is taking some time off for the holiday.

Crystal J. Parker
Jackson Walker L.L.P.
713-752-4217

From: Babcock, Chip
Sent: Tuesday, December 01, 2009 1:02 PM
To: Patricia L. Peden; Parker, Crystal; 'Nick Patton'; jh@jamesholmeslaw.com
Cc: Griffin, Richard; Moran, David; Schwarz, Kurt; Flynn-DuPart, Mary Lou; Adair, Kathy
Subject: RE: Deposition of Chuck Herring

Patty,
I will let Crystal respond for Herring but DeLouch is my responsibility and he will not give me dates. I will continue to reach out to him.
Chip

From: Patricia L. Peden [mailto:ppeden@pedenlawfirm.com]
Sent: Tuesday, December 01, 2009 12:58 PM
To: Parker, Crystal; 'Nick Patton'; jh@jamesholmeslaw.com
Cc: Babcock, Chip; Griffin, Richard; Moran, David; Schwarz, Kurt; Flynn-DuPart, Mary Lou; Adair, Kathy
Subject: RE: Deposition of Chuck Herring

Crystal:
What is the problem with Mr. Herring's availability and why is it that he is not available for an entire month after his deposition was originally set? Why do we still not have dates for Mr. DeLouch's deposition?
Patty

From: Parker, Crystal [mailto:cparker@jw.com]
Sent: Tuesday, December 01, 2009 10:44 AM
To: Patricia L. Peden; Nick Patton; jh@jamesholmeslaw.com
Cc: Babcock, Chip; Griffin, Richard; Moran, David; Schwarz, Kurt; Flynn-DuPart, Mary Lou; Adair, Kathy
Subject: RE: Deposition of Chuck Herring

I have been advised that Mr. Herring is no longer available on December 16. He is available on January 13 or 14. Please let me know quickly whether that works for you so he can reserve the date.

Thank you,

Crystal J. Parker
Jackson Walker L.L.P.
713-752-4217

From: Patricia L. Peden [mailto:ppeden@pedenlawfirm.com]
Sent: Tuesday, November 24, 2009 3:12 PM
To: Parker, Crystal; 'Nick Patton'; jh@jamesholmeslaw.com
Cc: Babcock, Chip; Griffin, Richard; Moran, David; Schwarz, Kurt; Flynn-DuPart, Mary Lou; Adair, Kathy
Subject: RE: Deposition of Chuck Herring

Crystal:
We can take Mr. Herring's deposition on the 16th. Where will it go forward? We will follow up with document requests. Will Cisco agree to produce Mr. Herring's documents to us at least one week prior to his deposition?
Thanks,
Patty

From: Patricia L. Peden [mailto:ppeden@pedenlawfirm.com]
Sent: Tuesday, November 24, 2009 11:47 AM
To: 'Parker, Crystal'; 'Nick Patton'; 'jh@jamesholmeslaw.com'
Cc: 'Babcock, Chip'; 'Griffin, Richard'; 'Moran, David'; 'Schwarz, Kurt'; 'Flynn-DuPart, Mary Lou'; 'Adair, Kathy'
Subject: RE: Deposition of Chuck Herring

Crystal:

We are working on it now and will have a date for you by the end of today.

Thanks,

Patty

From: Parker, Crystal [mailto:cparker@jw.com]
Sent: Tuesday, November 24, 2009 11:44 AM
To: Nick Patton; Patricia L. Peden; jh@jamesholmeslaw.com
Cc: Babcock, Chip; Griffin, Richard; Moran, David; Schwarz, Kurt; Flynn-DuPart, Mary Lou; Adair, Kathy; Parker, Crystal
Subject: RE: Deposition of Chuck Herring

Please let me know when you would like to depose Mr. Herring. His schedule is filling quickly.

Crystal J. Parker
Jackson Walker L.L.P.
713-752-4217

From: Parker, Crystal
Sent: Wednesday, November 18, 2009 3:43 PM
To: 'Nick Patton'; 'Patricia L. Peden'; jh@jamesholmeslaw.com
Cc: Babcock, Chip; Griffin, Richard; Moran, David; Schwarz, Kurt; Flynn-DuPart, Mary Lou; Adair, Kathy
Subject: Deposition of Chuck Herring

Chuck Herring is currently available for deposition on Dec. 16, 17 or 21. Please let us know as soon as possible which dates work for you so he can reserve the date.

Thank you,

Crystal J. Parker
Jackson Walker L.L.P.
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Houston, TX 77010
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713-752-4217 (direct)
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