

**EXHIBIT U**

Founded in 1852  
by Sidney Davy Miller

#2163  
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May 12, 2011

**Via Email**

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**RE: *Batts/Pringle: Depositions of Defendants William Adams,  
Stacy Ferguson, Allan Pineda and Jaime Gomez***

Dear Counsel:

Based on the Defendants' availability as offered by Bryan Cave, we would like to confirm the depositions of Defendants William Adams, Stacy Ferguson, Allan Pineda and Jaime Gomez in connection with the two pending cases as follows:

***Pringle v. William Adams Jr., et al.***

- 1) William Adams – Tuesday, July 19<sup>th</sup> at 10 a.m.
- 2) Sarah Ferguson – Tuesday, July 19<sup>th</sup> at 10 a.m.
- 3) Allan Pineda – Wednesday, July 20<sup>th</sup> at 10 a.m.
- 4) Jaime Gomez – Wednesday, July 20<sup>th</sup> at 10 a.m.

***Batts v. William Adams Jr., et al.***

- 1) William Adams – Thursday, July 21<sup>st</sup> at 10 a.m.
- 2) Sarah Ferguson – Thursday, July 21<sup>st</sup> at 10 a.m.
- 3) Allan Pineda – Friday, July 22<sup>nd</sup> at 10 a.m.
- 4) Jaime Gomez – Friday, July 22<sup>nd</sup> at 10 a.m.

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We will send revised notices of deposition to reflect same. If you are unable to proceed with both cases as outlined above, please provide an additional four days in July when these witnesses will be available to complete their testimony in the second case. We set the proposed schedule in an attempt to complete the depositions in both cases during the week that we have been told the witnesses are available.

We would also like to suggest that the parties retain a single court reporting firm for all depositions and share the cost pro rata. If you are amenable, we are happy to obtain price quotations from several qualified reporting firms. In the past, we have been successful in securing competitive real-time reporters at substantial cost savings. Let me know if such an arrangement is of interest to the defendants.

Please feel free to call me with any questions.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.



Dean A. Dickie

DAD/mbs

cc: *Counsel of Record*