

From: [Cenar, Kara](#)
To: [George Hampton](#)
Cc: [Mary Ann Hoyer](#); [Pink, Jonathan Stuart](#); dmiller@loeb.com; karen_thorland@mpaa.org; bslotnick@loeb.com; tdickstein@loeb.com; burrow@caldwell-leslie.com; pearson@caldwell-leslie.com; Dickie@MillerCanfield.com; gould@igouldlaw.com; rgreely@igouldlaw.com; koppenhoefer@millercanfield.com; [Colin Holley](#)
Subject: Re: Pringle v. William Adams, Jr. et al.
Date: Tuesday, March 22, 2011 3:44:20 PM

George,

Please forward a draft protective order governing confidentiality. As Plaintiff we look to you to provide a draft of this proposed order.

As for deposition dates, we are willing to work with you to set up an appropriate schedule and location, but unless the Notices are withdrawn or you indicate unequivocally an agreement to work out in good faith mutually convenient dates and locations (our clients may be out of the country on your arbitrarily selected dates and I have a jury trial) we cannot interpret your actions as an indication to cooperate. Let us know.

Please send the draft protective order, which will be required before any depositions can go forward, and please provide your written agreement to agree to mutually agreed to dates and locations which will accommodate schedules of counsel and witnesses work schedules and locations.

Thanks in advance for your cooperation.

Kara

On Mar 22, 2011, at 6:34 PM, George Hampton <ghampton@hamptonholley.com> wrote:

> Counsel,
>
> The depositions will remain as noticed unless and until the parties agree to mutually agreeable alternative dates. Accordingly, I would appreciate it if you would provide me with proposed alternative dates for the depositions.
>
> George
>
> -----Original Message-----
> From: Cenar, Kara [<mailto:Kara.Cenar@bryancave.com>]
> Sent: Tuesday, March 22, 2011 5:40 AM
> To: Mary Ann Hoyer
> Cc: Pink, Jonathan Stuart; dmiller@loeb.com; karen_thorland@mpaa.org; bslotnick@loeb.com; tdickstein@loeb.com; burrow@caldwell-leslie.com; pearson@caldwell-leslie.com; Dickie@MillerCanfield.com; gould@igouldlaw.com; rgreely@igouldlaw.com; koppenhoefer@millercanfield.com; Colin Holley; George Hampton
> Subject: Re: Pringle v. William Adams, Jr. et al.
>
> Counsel
>
> We will have to discuss alternative dates as the proposed dates conflict with pre set jury trials. I will talk with my clients as well, but the dates will have to be on a different date for counsel's schedule. I reserve all other objections to the Notices as served.
>
>
>
> Kara
>

> On Mar 21, 2011, at 9:18 PM, "Mary Ann Hoyer" <MHoyer@hamptonholley.com> wrote:

>

>> Please see the attached correspondence and deposition notices.

>>

>> Mary Ann Hoyer

>> Office Manager

>> HamptonHolley LLP

>> 2101 East Coast Highway, Suite 260

>> Corona del Mar, CA 92625

>> (949) 718-4550

>> P Please consider the environment before printing this e-mail.

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>>

>> <2011.03.21GLH(Pringle).pdf>

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> bcllp2010