

**From:** George Hampton  
**To:** ["Cenar, Kara"](#)  
**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:** Friday, March 25, 2011 3:42:00 PM  
**Attachments:** [Stipulated Protective Order re Confidential Information \(Pringle\).doc](#)

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Dear Kara,

This e-mail message responds to your March 22, 2011 e-mail in the above referenced matter. As Kate Koppenhoefer and I previously informed you during the Rule 26(f) conference in the Pringle matter, Plaintiffs' counsel do not believe that a protective order is necessary or appropriate in either the Batts or Pringle matters. Accordingly, your statement that you and the other defense counsel are looking to Plaintiffs' counsel to provide a draft of the proposed protective order is incongruous. Be that as it may and because you have expressly conditioned the depositions on receiving a "draft protective order," attached please find a draft protective order for your review and comment. Please note that nothing herein shall be construed as an admission that: (1) a protective order is necessary and appropriate; (2) Plaintiffs will stipulate to the entry of the draft protective order; or (3) information or documents designated as confidential under any protective order are properly designated as such.

Your position with respect to withdrawal of the deposition notices and rescheduling the depositions also does not square with reality. As set forth in my March 21, 2011 letters and as reiterated in my e-mail messages of earlier today, we are more than willing to reschedule the depositions once we have alternative dates. Your continued refusal to provide such dates, conditioning the depositions upon the receipt of a "draft protective order," and demanding that we withdraw the deposition notices as a condition precedent to further discussions regarding scheduling, all suggest that defendants are merely trying to forestall the discovery process.

I don't know how much more unequivocal I can be in trying to work out mutually convenient dates. Again and for the third time, please provide me with alternative dates for the depositions.

George Hampton

George L. Hampton IV  
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-----Original Message-----

From: Cengar, Kara [<mailto:Kara.Cengar@bryancave.com>]

Sent: Tuesday, March 22, 2011 3:44 PM

To: George Hampton

Cc: Mary Ann Hoyer; Pink, Jonathan Stuart; dmiller@loeb.com; karen\_thorland@mpaa.org; bsloznick@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.

George,

Please forward a draft protective order governing confidentiality. As Plaintiff we look to you to provide a draft or 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](mailto: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: Cengar, Kara [<mailto:Kara.Cengar@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; bsloznick@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