# EXHIBIT L

### **Kristen Caverly**

From:

Catherine J. MacIvor [CMacIvor@mflegal.com]

Sent:

Monday, June 09, 2008 3:31 PM

To:

Kristen Caverly

Subject: RE: Plaintiffs' Deposition Schedule

Kristen,

Please see below:

- 1. Jane Herring is scheduled for Washington, DC & is on the e-mail that I sent last week. Linda Brown can be taken in Minneapolis. I will have to get back to you about Lisa MacDonald, but we can work her in in Miami.
- 2. I will check abut the Kotzampaltiris / Lucarelli dates
- 3. I will revert about Ann Quinn dates

#### CATHERINE J. MACIVOR

Partner
Maltzman Foreman, PA
2 South Biscayne Boulevard
Suite 2300

Miami, Florida 33131 Tel: (305) 358-6555 Fax: (305) 374-9077

Email: CMacIvor@mflegal.com

# MALTZMAN FOREMAN

Website | V. Card

The information transmitted herein is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this message in error, please contact the sender and delete the material from any computer. Under applicable U.S. Treasury Regulations, we are required to inform you that any advice contained in this electronic mail message (or any attachment hereto) is not intended to be used, and cannot be used, to avoid tax penalties imposed under the Internal Revenue Code.

From: Kristen Caverly [mailto:kcaverly@hcesq.com]

Sent: Monday, June 09, 2008 4:33 PM

To: Catherine J. MacIvor

Subject: RE: Plaintiffs' Deposition Schedule

Cathy,

Nothing but my name was sent.

I wanted to follow up my email last night anyway with a couple more questions that came from my call with the manufacturing defendants today.

- 1. Where/When are you proposing Linda Brown, Lisa MacDonald, and Jane Herring? These plaintiffs are not on the list.
- 2. Please provide some proposed dates for Ann Quinn in Las Vegas.
- 3. Can you move Kotzampaltitis to August 7 instead of August 4?

I am trying to coordinate a lot of individual interests and scheduled on the defense side, so the more specifics you can give me before the call tomorrow the more likely I can get sign off.

Kristen

Kristen E. Caverly, Partner Henderson & Caverly LLP

This e-mail message contains information from the law firm of Henderson & Caverly LLP which may be confidential and privileged. The information is intended for the sole use of the individual or entity named in the address box. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

From: Catherine J. MacIvor [mailto:CMacIvor@mflegal.com]

Sent: Monday, June 09, 2008 12:01 PM

To: Kristen Caverly

Subject: RE: Plaintiffs' Deposition Schedule

Kristen

**From:** Kristen Caverly [mailto:kcaverly@hcesg.com]

**Sent:** Monday, June 09, 2008 4:00 AM

**To:** Catherine J. MacIvor

Cc: Russell Keith

Subject: Plaintiffs' Deposition Schedule

Cathy,

I have not been able to get a consensus amongst the defendants regarding your email last week on plaintiffs' depositions. We have a group call scheduled for Tuesday, so hopefully I will be able to let you know after that call.

To that end, there are named plaintiffs who are not on the schedule you proposed last week. Why and when do you propose defendants depose those plaintiffs?

Do you agree that each party participating in a deposition may only have one lawyer asking questions or interposing objections?

Are you willing to double up the one Miami deposition (I believe of Peters) to avoid having defense counsel stay over the Labor Day weekend?

Within a particular location, are you willing to rearrange plaintiffs to accommodate defense counsel

schedules?

These are some of the issues discussed last week, so it would be helpful to know your position before I speak with the group again on Tuesday.

Kristen

Kristen E. Caverly, Partner Henderson & Caverly LLP 16236 San Dieguito Road, Suite 4-13 P.O. Box 9144 (all US Mail) Rancho Santa Fe, CA 92067-9144 858-756-6342 x)101 858-756-4732 fax

This e-mail message contains information from the law firm of Henderson & Caverly LLP which may be confidential and privileged. The information is intended for the sole use of the individual or entity named in the address box. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

## **Kristen Caverly**

From:

Kristen Caverly

Sent:

Monday, June 09, 2008 1:36 PM

To:

'Catherine J. MacIvor'

Subject: RE: Plaintiffs' Deposition Schedule

Cathy,

Our emails crossed, so please see mine of a few minutes ago. These are the specific comments I have so far, so I think we are getting close.

I am in Hawaii this week, so the time difference is not quite as bad. However, I am on vacation and you are working so get back to me when you can and I will follow up with you after our group call tomorrow.

Kristen

Kristen E. Caverly, Partner Henderson & Caverly LLP

This e-mail message contains information from the law firm of Henderson & Caverly LLP which may be confidential and privileged. The information is intended for the sole use of the individual or entity named in the address box. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

From: Catherine J. MacIvor [mailto:CMacIvor@mflegal.com]

Sent: Monday, June 09, 2008 1:31 PM

To: Kristen Caverly

Subject: RE: Plaintiffs' Deposition Schedule

Kristen,

Please advise which Plaintiffs I omitted? Given the travel to Taiwan and the time difference, I am sure that you are right, but I would appreciate knowing who.

As for the one party, one lawyer rule, I would agree, but maintain that only defense counsel against whom the Plaintiffs have claims should be questioning the Plaintiffs.

I can double up the Isern deposition day in Miami.

As for rearranging the Plaintiffs, they have arranged their own schedules and conflicts to come up with and commit to these dates. I now have their approval and given your terms of no rescheduling barring illness or emergency, I have them committed. I would prefer to keep it that way. But in the interest of compromise, are we talking a few or almost all? Specifics?

From: Kristen Caverly [mailto:kcaverly@hcesq.com]

Sent: Monday, June 09, 2008 4:00 AM

To: Catherine J. MacIvor

Cc: Russell Keith

Subject: Plaintiffs' Deposition Schedule

Cathy,

I have not been able to get a consensus amongst the defendants regarding your email last week on plaintiffs' depositions. We have a group call scheduled for Tuesday, so hopefully I will be able to let you know after that call.

To that end, there are named plaintiffs who are not on the schedule you proposed last week. Why and when do you propose defendants depose those plaintiffs?

Do you agree that each party participating in a deposition may only have one lawyer asking questions or interposing objections?

Are you willing to double up the one Miami deposition (I believe of Peters) to avoid having defense counsel stay over the Labor Day weekend?

Within a particular location, are you willing to rearrange plaintiffs to accommodate defense counsel schedules?

These are some of the issues discussed last week, so it would be helpful to know your position before I speak with the group again on Tuesday.

Kristen

Kristen E. Caverly, Partner Henderson & Caverly LLP 16236 San Dieguito Road, Suite 4-13 P.O. Box 9144 (all US Mail) Rancho Santa Fe, CA 92067-9144 858-756-6342 x)101 858-756-4732 fax

This e-mail message contains information from the law firm of Henderson & Caverly LLP which may be confidential and privileged. The information is intended for the sole use of the individual or entity named in the address box. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.