

# **EXHIBIT G**

**Kristen Caverly**

**From:** Kristen Caverly  
**Sent:** Monday, May 12, 2008 6:20 PM  
**To:** 'Catherine J. MacIvor'  
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**Subject:** Blazkowski - Plaintiffs Deposition Schedule

Cathy,

I am writing to remind you that defendants are waiting for an alternative proposal from you for plaintiffs' depositions. You indicated when we spoke in April that you would provide a schedule on May 6. On May 7 when we spoke regarding defendants' document productions, you confirmed that you would have that schedule to me promptly. I still have not received even a partial proposal for plaintiffs' depositions and the footnote in your letter regarding the document productions to the effect that you would not even be available to begin depositions until mid-July was very discouraging. If we wait until mid-July to begin the depositions, there is little chance that we will finish even plaintiffs' depositions before the end of August and that would mean taking a deposition every day for six weeks, which is hardly favorable to anyone's schedule, particularly since you wish to take the depositions in various locations around the county rather than in Miami as defendants suggested. With the number of plaintiffs you have, the travel which will be required for each group of depositions, and the short time defendants have to prepare to defend your class certification motion, it is very important that we get these depositions on everyone's calendars soon. Please provide your proposed schedule in the next two days so that I can get defense counsel's feedback to your proposal and start calendaring the depositions.

Kristen

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7/16/2008