

EXHIBIT D

Sean Santini

From: Sean Santini
Sent: Tuesday, September 16, 2014 2:28 PM
To: 'Kenia Bravo'
Cc: Averil Andrews; avelinogonzalez@bellsouth.net; Betty Caballero
Subject: RE: Corbacho v. Puig

Kenia,

I'm grateful for the professional courtesies you've extended to me. I will note that I've extended the same courtesies to you and remain willing, within reason, to continue accommodating your work schedule.

All I asked below was for a date certain in October for the taking of your client's deposition. If, due to your work schedule, there isn't a single day in the month of October when you're available for your client's deposition, then please provide me some options in early November (I, too, have scheduling constraints I need to work around).

Telling me that I'm going to have to wait "until after December" to get a date from you for your client's deposition simply is not reasonable. Again, I'd appreciate it if you'd please provide me by September 25 with a date certain (if it can't be October, then early November) when I can depose your client. Thanks,

Sean

From: Kenia Bravo [mailto:avelinogonzalez2@bellsouth.net]
Sent: Monday, September 15, 2014 3:35 PM
To: Sean Santini
Cc: Averil Andrews; avelinogonzalez@bellsouth.net; Betty Caballero
Subject: RE: Corbacho v. Puig

Sean,

I will ask you to recall what occurred on or about August 7, 2014. On July 7, 2014, you asked us for a three week extension of time to respond to Plaintiff's Complaint (please see attached email). We graciously did not object to that extension. On July 30, 2014 you asked for one additional extension, until August 8, 2014, to answer the Complaint (please see attached email). We once again extended you that professional courtesy. Since you did not even have the opportunity to file an Answer until August 8, 2014, we could not reasonably assume that you would be holding a deposition in the same case on August 7, 2014.

Secondly, neither one of your notices for deposition have been served in good faith because you know very well that our client is in Cuba serving out what is left of a prison sentence that your client's actions forced on him. Due to your client's

behavior, Corbacho Daudinot cannot obtain a passport to travel to the United States or anywhere else. Irrespective of that, we are doing our best to comply with what we stated in court—to bring Corbacho Daudinot here to be deposed by the Defendant and to testify in court.

Just as you have asked us to give you extensions of time, we are asking you for some leeway until after December to schedule Corbacho Daudinot's deposition due, not only to Corbacho Daudino's location, but to our office's burdensome workload. We are inundated with excessive amounts of work, and would appreciate your professional courtesy in this matter.

Sincerely,

Kenia Bravo

From: Sean Santini [<mailto:SSantini@santinilawfirm.com>]
Sent: Monday, September 15, 2014 1:37 PM
To: Avelino Gonzalez
Cc: Averil Andrews; avelinogonzalez@bellsouth.net; Betty Caballero
Subject: Corbacho v. Puig

Kenia,

Hello. Twice now I've noticed your client for deposition. Both times your client failed to show. On neither occasion did your client move for a protective order, nor did you reach out to propose alternative dates for your client's deposition (as I invited you to do when I noticed the depositions initially).

Please get back to me by no later than September 25, 2014 with a date certain in October for your client's deposition. If I do not hear from you by the 25th, I'll have no choice but to file a Rule 37 motion. I trust it won't come to that.

Regards,

Sean

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