

From: [Sean Santini](#)
To: [Kenia Bravo](#); avelinogonzalez@bellsouth.net
Cc: [Averil Andrews](#)
Subject: RE: Corbacho v. Puig
Date: Tuesday, February 10, 2015 3:41:11 PM

Thanks for getting back to me, Kenia. Hope you're feeling better. Do you have any sense of whether you'll be able to reach your client before the weekend?

From: Kenia Bravo [mailto:avelinogonzalez2@bellsouth.net]
Sent: Monday, February 09, 2015 6:34 PM
To: Sean Santini; avelinogonzalez@bellsouth.net
Cc: Averil Andrews
Subject: RE: Corbacho v. Puig

Sean,

I have been out of the office all day due to illness, and came in just to pick up a file that I need for tomorrow morning.

I have not been able to speak to Avelino about this weekend, but it is my understanding that they were not able to communicate due to some kind of technical difficulty. But I know that Avelino is still working on getting in contact with him.

Sincerely,

Kenia Bravo, Esq.

From: Sean Santini [mailto:SSantini@santinilawfirm.com]
Sent: Monday, February 09, 2015 11:58 AM
To: Kenia Bravo; avelinogonzalez@bellsouth.net
Cc: Averil Andrews
Subject: RE: Corbacho v. Puig

Hello. Were you able to speak with your client this weekend about settlement?

Sean

From: Sean Santini
Sent: Wednesday, February 04, 2015 5:36 PM
To: 'Kenia Bravo'; avelinogonzalez@bellsouth.net
Cc: Averil Andrews
Subject: RE: Corbacho v. Puig

No problem (It's just that I really need to get this case ready if this isn't going to settle).

From: Kenia Bravo [<mailto:avelinogonzalez2@bellsouth.net>]
Sent: Wednesday, February 04, 2015 5:25 PM
To: Sean Santini; avelinogonzalez@bellsouth.net
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Subject: RE: Corbacho v. Puig

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Avelino was not here earlier. I thought we would be able to speak with our client by tomorrow, but it turns out that we shall not be able to speak with him until Saturday, when he shall have access to a telephone booth.

I'm sorry for the confusion, but let's maintain the spirit of negotiation open until Saturday afternoon.

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From: Sean Santini [<mailto:SSantini@santinilawfirm.com>]
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Hola, Avelino. Pudiste hablar con Miguel Ángel? Dado los comentarios de la juez, no nos podemos dar el lujo de esperar mucho más para comenzar con el desahogo de pruebas.

Saludos,

Sean

Sean R. Santini

Santini Law

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Suite 2650

Miami, Florida 33131

305-372-7307 (direct)

305-372-7308 (fax)

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To: [Kenia Bravo](#); avelinogonzalez@bellsouth.net
Cc: [Averil Andrews](#)
Subject: RE: Corbacho v. Puig
Date: Thursday, February 26, 2015 5:31:33 PM

Hello, Kenia. Hope this finds you well. Two questions:

- (1) Has Avelino been able to speak with plaintiff regarding settlement?
- (2) Do you have any updates on plaintiff's arrival in the United States?

Regards,

Sean

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Sent: Tuesday, February 10, 2015 6:39 PM
To: Sean Santini; avelinogonzalez@bellsouth.net
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I'm doing better, Sean. Thanks for asking.

As for getting in contact with our client, for some reason he has not been able to attain access to the phone booth. We are unclear if the phone booth was disabled or what may have happened, but it is our intent to get in contact with him before the weekend.

Let me assure you that Avelino is working on this matter with an interest in reaching a mutually beneficial agreement that is in our client and in your client's best interest. Be aware that what we stated in court is true—if our clients do not reach an agreement, we shall put no hindrance on discovery when our client comes to the United States.

Sincerely,

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From: Sean Santini [mailto:SSantini@santinilawfirm.com]
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To: [Kenia Bravo](#); avelinogonzalez@bellsouth.net
Cc: [Averil Andrews](#)
Subject: RE: Corbacho v. Puig
Date: Monday, February 09, 2015 11:58:27 AM

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From: [Sean Santini](#)
To: [Kenia Bravo](#)
Cc: avelinogonzalez@bellsouth.net; [Averil Andrews](#)
Subject: Corbacho v. Puig
Date: Tuesday, March 03, 2015 1:29:32 PM
Attachments: [15-03-03-Third Notice of Taking Deposition of Plaintiff Corbacho 3-13-15.pdf](#)
[15-03-03 First RFP to Corbacho.pdf](#)

Hello, Kenia. Not having heard back from you regarding settlement, I have no choice but to proceed with discovery. To that end, attached are Defendants' Third Notice of Taking Plaintiff's Deposition and First Request for Production of Documents. So as to avoid incurring unnecessary expenses, I'd appreciate it if you'd let me know whether Mr. Corbacho will be attending his deposition as noticed and, if so, whether he'll require an interpreter.

Regards,

Sean

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