

## Ryan Fountain

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**From:** Ryan Fountain <RyanFountain@aol.com>  
**Sent:** Monday, October 25, 2010 12:06 PM  
**To:** 'John LaDue'  
**Cc:** 'Irmscher, David P.'; 'Gallagher, Jerry'  
**Subject:** RE: HEartland v. Forest River: Gallagher Depositoin

John,

We have a hearing with the Court on the 17<sup>th</sup>, so I would prefer the 18<sup>th</sup>. I fully expect the deposition to be completed within the time limits you noted.

Ryan

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**From:** John LaDue [mailto:JLaDue@LCK-Law.com]  
**Sent:** Monday, October 25, 2010 11:22 AM  
**To:** Ryan Fountain  
**Cc:** Irmscher, David P.; Gallagher, Jerry  
**Subject:** RE: HEartland v. Forest River: Gallagher Depositoin

Ryan:

Jerry and I are available on either Nov. 17 or 18 in my office in South Bend. I would prefer the morning of November 17<sup>th</sup>. I will leave it to you and Dave Irmscher to determine whether taking further deposition testimony from Jerry is appropriate under the circumstances. If Jerry is required to provide further deposition testimony in this case, please note he has already been deposed for approximately 5 hours and 15 minutes (not including breaks). Under FRCP 30(d)(1), any additional deposition testimony from Jerry must be concluded in 1 hour and 45 minutes or less.

John

John D. LaDue  
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**From:** Ryan Fountain [mailto:RyanFountain@aol.com]  
**Sent:** Sunday, October 24, 2010 3:42 PM  
**To:** John LaDue  
**Subject:** HEartland v. Forest River: Gallagher Depositoin

John,