

Ryan Fountain

From: John LaDue [JLaDue@LCK-Law.com]
Sent: Friday, December 18, 2009 10:29 AM
To: Ryan Fountain
Cc: david.irmscher@bakerd.com
Subject: RE: Heartland v. Forest River: Barnes and Thornburg Subpoena

Ryan: B&T intends to respond to your subpoena by providing documents (instead of objections), so, I understand that you are agreeing to allow B&T until January 8th to provide its responsive documents. I understand the time constraints described in your e-mail and I will do my best to provide the documents earlier (before January 8th). As for future deposition dates, I will also do my best to help accommodate the deadlines that you discussed in your e-mail. But, as you know, scheduling is challenging considering that everyone involved seems to be a lawyer with many conflicting obligations. Let's assume that you will have B&T documents by January 8th and begin discussing possible deposition dates now. John

John D. LaDue

LADUE | CURRAN | KUEHN

Attorneys & Counselors at Law

200 First Bank Building

205 West Jefferson Blvd.

South Bend, Indiana 46601

(574) 968-0760 (office)

(574) 968-0761 (fax)

(574) 968-0769 (direct)

jladue@lck-law.com

www.lck-law.com