

Message

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Jon Katz

From: Jon Katz [jon@markskatz.com]
Sent: Tuesday, December 05, 2006 5:35 PM
To: 'Summers, Sean E.'
Cc: 'aleida@markskatz.com'
Subject: RE: Snyder v. Phelps, et al., Civil No. RDB 06-1389

Hi, Sean- Thanks for your message.

I'm happy we finally got a chance to talk, last week. Please see my reply below IN CAPS.

Jon Katz
MARKS & KATZ, LLC
Silver Spring, MD 20910, (301) 495-4300
Underdog Blog: <http://markskatz.com/JusticeBlog>

From: Summers, Sean E. [mailto:ssummers@barley.com]
Sent: Tuesday, December 05, 2006 2:14 PM
To: jon@markskatz.com
Subject: RE: Snyder v. Phelps, et al., Civil No. RDB 06-1389

Jon,

I understand from our conference that you are agreeable to 30 hours per side of deposition time. Please confirm. YES. I BELIEVE THE COURT SAID THAT THIS WILL BE THE NUMBER OF HOURS IF THE COURT DID NOT HEAR OTHERWISE.

By today, we are supposed to report (1) the number of hours of deposition time, PLEASE SEE ABOVE. (2) whether to proceed with a magistrate and (3) whether a settlement conference is necessary. Under the circumstances, we do not believe two and three are worth pursuing, and we will, therefore, decline those options.

Please confirm you are agreeable to 30 hours deposition time. AGREED.

Also, we will be sending written discovery in the near future and scheduling Mr. Phelps deposition. AS WILL I. We will need responses to the written discovery before we take Mr. Phelps deposition. I SUGGEST WE SCHEDULE DEPOSITIONS AS MUCH IN ADVANCE AS POSSIBLE. MY JANUARY SCHEDULE IS VERY FULL, AND FEBRUARY IS FILLING UP FOR ME TO SET ASIDE TWO FULL DAYS (ONE TO TRAVEL, AND THE OTHER TO TAKE DEPOSITIONS). I WILL DEPOSE MR. SNYDER, AT THE VERY LEAST. DO YOU WISH FOR ME TO SUGGEST SOME DATES?

We plan to amend our complaint to name the adult individuals from WBC that participated with Mr. Phelps during Matt Snyder's funeral. I WILL INFORM YOU IF DEFENDANTS CONSENT AFTER RECEIVING YOUR SPECIFIC REQUEST. When that time arrives, I will be asking you whether you will accept service on their behalf or if we should serve them directly. I WILL AWAIT YOUR SPECIFIC REQUEST.

Thank you for your cooperation in this matter and I await your response. Do not hesitate to contact me with questions or concerns.

Sean

12/22/2006