

Matt Cologna

From: Grant Doty [grant@aclu-em.org]
Sent: Thursday, November 01, 2012 9:19 AM
To: Doug Harpool
Cc: Matt Cologna
Subject: RE: Faxed proposal re: Hunter depo

Sounds good. Thanks.

Grant

From: Doug Harpool [mailto:dharpool@blmhpc.com]
Sent: Thursday, November 01, 2012 8:58 AM
To: Grant Doty
Cc: Matt Cologna
Subject: RE: Faxed proposal re: Hunter depo

Great. I advised the Judges clerk when she called to advise of the telephone hearing that we were trying to work it out, expected to be successful and I didn't think a telephone conference ultimately would be required. We will draft a motion which proposes extending the deadlines and represent in it both parties agree to the changes. A copy will be sent to you for approval before filing.

Let us know when your client's health improves so as to allow her to appear at deposition.

From: Grant Doty [mailto:grant@aclu-em.org]
Sent: Thursday, November 01, 2012 8:54 AM
To: Matt Cologna; Doug Harpool
Subject: Faxed proposal re: Hunter depo

Just read your fax. If it is OK with Judge Webber, we are more than agreeable, as you propose, to extending the time to disclose and file your expert's report seven days beyond the date we are able to coordinate our client's deposition and then allowing us 21 days to depose your expert beyond the expert report date.

Grant
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Grant R. Doty
Staff Attorney
AMERICAN CIVIL LIBERTIES UNION OF EASTERN MISSOURI
454 Whittier Street
St. Louis, Missouri 63108
Email: grant@aclu-em.org
Phone: 314/652-3114
Fax: 314/652-3112

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