

## Matt Cologna

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**From:** Matt Cologna  
**Sent:** Friday, December 21, 2012 11:10 AM  
**To:** 'Grant Doty'  
**Subject:** RE: Mediator

I spoke with Doug and he said he would rather not wait 90 days to mediate so we may want to revisit the mediator and see if we can find someone else who can do it sooner. I think the court will be understanding if we say that we're making a good faith effort to mediate this. Also, any word on deposition dates for your client and discovery responses? Thanks,

Matt

Matt Cologna  
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**From:** Grant Doty [<mailto:grant@aclu-em.org>]  
**Sent:** Friday, December 21, 2012 10:30 AM  
**To:** Matt Cologna  
**Subject:** RE: Mediator

I assume then we can ask for an extension?

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**From:** Matt Cologna [<mailto:mcologna@blmhpc.com>]  
**Sent:** Friday, December 21, 2012 10:29 AM



**To:** Grant Doty  
**Subject:** RE: Mediator

Grant,

Just got your voicemail. I emailed Doug with the available dates but he has been out of the office since yesterday afternoon and I don't think I'll get a response until he's back. I think we should just disclose the mediator and inform the court that we intend to mediate, but are still ironing out a firm date. I think one of the dates you proposed will work, but I don't want to commit to them without hearing from Doug. Thanks,

Matt

Matt Cologna  
[mcologna@blmhpc.com](mailto:mcologna@blmhpc.com)

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**From:** Grant Doty [<mailto:grant@aclu-em.org>]  
**Sent:** Thursday, December 20, 2012 11:25 AM  
**To:** Matt Cologna  
**Subject:** RE: Mediator

Matt,

We contacted Richard Scher's office. His first date available is in March.

Please let me know which of the following three dates work for you: March 6, 11, or 20.



Of course, any of these dates will require a motion for extension of time to complete mediation. Please let me know if we can file a joint motion to that effect.

Thanks.

Grant

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**From:** Matt Cologna [<mailto:mcologna@blmhpc.com>]  
**Sent:** Tuesday, December 18, 2012 5:14 PM  
**To:** Grant Doty  
**Subject:** Mediator

Grant,

Got your phone message regarding the disclosure of the mediator. We can agree on Richard Scher. I'll send you another email or letter tomorrow with a few other questions about mediation and other issues. Thanks,

Matt

Matt Cologna  
[mcologna@blmhpc.com](mailto:mcologna@blmhpc.com)

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