

**Wilson, Nicole**

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**From:** Wilson, Nicole  
**Sent:** Monday, October 25, 2004 1:55 PM  
**To:** 'Daniel Haude'; Robert.Hanna@TuckerEllis.com  
**Cc:** Bollin, Kip  
**Subject:** RE: Malkamaki (10/25/04)

We would prefer Thursday morning to Friday morning, but I can make myself available for either.

I would reiterate, however, that we object to the continued taking of depositions in this matter, as the fact discovery deadline has already passed. Further, in light of the fact that motions for summary judgment are due on Monday, November 1st, we expect you to stipulate that we can supplement our motion for summary judgment with any relevant citations to the deposition once we have a transcript. (One of the purposes of a fact discovery deadline, of course, is to avoid this problem.) Please confirm for me that you will stipulate to this.

Nicole

Nicole K. Wilson  
Thompson Hine LLP  
3900 Key Center  
127 Public Square  
Cleveland, Ohio 44114-1291

(216)566-5623 (telephone)  
(216)566-5800 (facsimile)

-----Original Message-----

**From:** Daniel Haude [mailto:dhaude@reminger.com]  
**Sent:** Monday, October 25, 2004 12:56 PM  
**To:** Wilson, Nicole; Robert.Hanna@TuckerEllis.com  
**Subject:** Malkamaki (10/25/04)

Nicole, I know that Rob is available Friday morning for a deposition, are you? If you are, I will subpoena the Ohio CAT witness for a 9:00 a.m. deposition here at R & R. Thanks.