

Deborah Race

From: Deborah Race
Sent: Friday, June 22, 2007 12:27 PM
To: 'Doug McSwane'
Subject: AdvanceMe v. RapidPay, et al.

Doug,

Here is what my folks can do right now. They will agree to extend the depositions already noticed until September and will consider extending others provided your folks will identify who those others are. Obviously, if more come up, we can address them at that time, but they do not want the extension to be a blanket extension.

As for written discovery, they will agree to extend the response time to the outstanding RFAs for two weeks.

They are happy to try to designate who they will call live if you will do the same. I know you have told me Lee Sukow; Laurent Bouchard, Thomas Little and Edward Landon, but I was not sure if that was a complete list or if that was firm. Can you confirm and I will see if I can't get them to provide a list as well.

Finally, with respect to a meet and confer on Monday, they are happy to do that. However, they have a problem with the nature of the designations provided from your folks. According to Michael, the designations often span pages of testimony, rather than being line and page designations and it makes it difficult for them to even review for objections since they are not sure of the specific testimony intended.

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