

Patricia L. Peden

From: Patricia L. Peden [ppeden@pedenlawfirm.com]
Sent: Wednesday, November 19, 2008 6:05 PM
To: 'Babcock, Chip'; 'jh@jamesholmeslaw.com'
Cc: 'glmlawoffice@gmail.com'; 'Nick Patton'; 'Parker, Crystal'
Subject: RE: ALBRITTON v. CISCO: Please see attached letter.

Chip:

On Tuesday we agreed to set down after Ms. Beckwith's deposition today to meet and confer regarding outstanding discovery issues in this case, including the subpoena you served on John Ward Jr., Albritton's interrogatory responses, and the list of issues raised in Nick's letter to you. After Ms. Beckwith's deposition, Crystal and George said they were uncomfortable doing the meet and confer without you present. I gave Crystal my contact information and told her that I would make myself available anytime today. If I had received an email in advance of your telephone call giving me a time, I would have been free to discuss the issues. However at the time you called I was on the phone. I will be out of the office tomorrow morning but will be in mid to late afternoon. If you want to talk then, I will be available if you can give me the courtesy of some advanced notice. I don't think your one attempt to reach me late today, and your voice mail that you will file your motion tomorrow if we don't talk, satisfies the meet and confer requirement. I will object to any motion you file on that basis. As I told you yesterday, I think that we can reach agreement on some of the issues, and I was prepared to do so today. Also, under the agreed scheduling order we filed with the Court the motions are now not due until next week, so there is no reason to file a needless motion tomorrow.

Please be prepared tomorrow to discuss the document issues raised in Nick's letter to you, the document requests made during the recent depositions, the document question that I raised with Crystal today, and the email regarding Frenkel's hard drive that Nick sent to you today.

I look forward to resolving these issues tomorrow.
Patty

From: Senneff, Angie [mailto:asenneff@jw.com] **On Behalf Of** Babcock, Chip
Sent: Wednesday, November 19, 2008 4:59 PM
To: jh@jamesholmeslaw.com
Cc: glmlawoffice@gmail.com; Nick Patton; ppeden@pedenlawfirm.com; Parker, Crystal
Subject: ALBRITTON v. CISCO: Please see attached letter.

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