

John Jacks

From: John Henry [jhenry@jhenrylaw.com]
Sent: Monday, January 24, 2011 1:23 AM
To: John Jacks
Subject: Deliverance discovery

John,

I was able to arrange a call Monday with Ian to get responses to the issues you posed on Friday. I know now, though, that we will be filing a response in opposition to the third amended petition today.

Also, I can tender Mr. Mizrachi as soon as the second week in February. If Carlos is available we can do those on consecutive days here in Austin. I am also most interested in deposing Mr. Mills. Let me know what days work for you in that regard.

I also need contact information for Mr. Wallace, as none has yet been provided.

Finally, I will supplement Mizrachi's discovery responses to include Chris Porter, who has been his sole point of contact with respect to these matters, and amend his answer to address some of the issues you raised in response to his discovery responses.

John

