

John Jacks

From: John Jacks
Sent: Monday, January 24, 2011 7:59 AM
To: 'John Henry'
Cc: Doug Becker

John,

Thank you for your email over the weekend. I understand you need to visit with your client contact for Tiltware on some issues and I appreciate your willingness to amend the discovery responses of Michael Mizrachi, but we still need to visit about other issues, such as when we can obtain the documents your client has agreed to produce.

I will discuss with Doug and our client the proposed deposition dates, but I still think it would be more efficient for us to talk to try to coordinate all of the depositions at once. If we can get all of the witnesses to voluntarily come to Austin, that would be great, but I anticipate that we will need to travel (to Las Vegas?) to secure others. For example, I have spoken to Maurice Mills and, based on my conversation with him, he might be willing to be deposed in Las Vegas (assuming it could be coordinated with his schedule), but I did not get the sense he would be willing to travel to Austin. He also may require a subpoena—he is not under our control—and, in that case, we'll have to travel to Washington. I suspect there are other witnesses we'll need to depose that reside in Las Vegas. We need to discuss this.

One other note: I do not have contact information for Bobby Wallace. I will continue to try to obtain it and will, of course, provide it to you if I do obtain it.

Please give me a call to discuss these matters.

Sincerely,


John

John Jacks

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