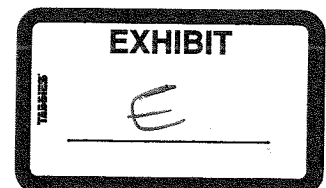


From: "Sabrina Haurin" <sabrina.haurin@baileycavalieri.com>
Subject: Allison v. Wise, No. 2:08-cv-157 (S.D. Ohio)
Date: July 24, 2009 4:08:48 PM CDT
To: "Thomas Howard" <thoward@gdhlaw.com>, "Furniss, Natalie" <nfurniss@bricker.com>, "Wendi Nadel" <wnadel@gdhlaw.com>
Cc: <cmudd@muddlawoffices.com>
Return-Path: <sabrina.haurin@baileycavalieri.com>
Delivered-To: cmudd@738414.763001
Received: (qmail 15098 invoked by uid 78); 24 Jul 2009 21:08:49 -0000
Received: from unknown (HELO ns-mr35.netsolmail.com) (10.49.16.222) by 0 with SMTP; 24 Jul 2009 21:08:49 -0000
Received: from mail.baileycavalieri.com (mail.baileycavalieri.com [207.54.180.3]) by ns-mr35.netsolmail.com (8.13.6/8.13.6) with ESMTP id n6QL8nnf007801 for <cmudd@muddlawoffices.com>; Fri, 24 Jul 2009 17:08:49 -0400
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Thread-Topic: Allison v. Wise, No. 2:08-cv-157 (S.D. Ohio)
Thread-Index: AcnEV4ulYSqOkVC8RwajZwPQOI9PsQVMMzgABVCLemAAJ/vfgAKTtylGBlg9SBA=

Counsel:

Defendants intend to produce to Plaintiff amended Rule 26(a)(1) initial disclosures, as well as additional documents next week in the above-referenced matter. I will be in touch shortly regarding this matter.

Sincerely,
Sabrina Haurin
Bailey Cavalieri LLC
One Columbus
10 West Broad Street, Suite 2100
Columbus, Ohio 43215-3422
Direct: (614) 229-3253
General: (614) 221-3155
Fax: (614) 221-0479
E-mail: sabrina.haurin@baileycavalieri.com
Website: www.baileycavalieri.com



From: "Sabrina Haurin" <sabrina.haurin@baileycavalieri.com>
Subject: Allison v. Wise, No. 2:08-cv-157 (S.D. Ohio)
Date: July 28, 2009 8:57:16 AM CDT
To: "Wendi Temkin" <wtemkin@gdhlaw.com>
Cc: <cmudd@muddlawoffices.com>
Return-Path: <sabrina.haurin@baileycavalieri.com>
Delivered-To: cmudd@738414.763001
Received: (qmail 12935 invoked by uid 78); 28 Jul 2009 13:57:19 -0000
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Received: from mail.baileycavalieri.com (mail.baileycavalieri.com [207.54.180.3]) by ns-mr25.netsolmail.com (8.13.6/8.13.6) with ESMTP id n6SDvISB013471 for <cmudd@muddlawoffices.com>; Tue, 28 Jul 2009 09:57:18 -0400
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Thread-Index: AcnzUVfbrC6ODJdTRlydm/fRLmRbkQACuHggBuXBq/A=
References: <AD4EC4C0-4B81-48D2-8466-5A402E636031@muddlaw.pro>
<AAC68A09BA47624297D97F04F42C50C1483833@server03>

Wendi,

As we discussed on the phone yesterday, the discovery cut-off deadline in the above-referenced matter is this Friday, July 31st. If your client is agreeable to continuing to conduct discovery after this deadline, please let us know, and we will reschedule the deposition that has been noticed for this Friday. Please provide us with a few dates upon which Mr. Allison would be available to sit for a deposition within the next few weeks.

Additionally, as I indicated in my e-mail to you last week, our client intends to produce to Plaintiff amended Rule 26(a)(1) initial disclosures and additional documents in this matter this week. As such, it appears that it may be worthwhile to approach the Court about extending the discovery cut-off deadline in this matter by one or two months. If your client would be agreeable to such an extension, I will prepare a motion to amend the case schedule.

Sincerely,
Sabrina Haurin
Bailey Cavalieri LLC
One Columbus
10 West Broad Street, Suite 2100
Columbus, Ohio 43215-3422
Direct: (614) 229-3253
General: (614) 221-3155
Fax: (614) 221-0479
E-mail: sabrina.haurin@baileycavalieri.com
Website: www.baileycavalieri.com

From: "Wendi Temkin" <wtemkin@gdhlaw.com>
Date: July 28, 2009 3:35:56 PM CDT
To: "Sabrina Haurin" <sabrina.haurin@baileycavalieri.com>
Cc: <cmudd@muddlawoffices.com>, "Thomas Howard" <thoward@gdhlaw.com>, "Dave Allison" <dave@cheatcc.com>
Subject: RE: Allison v. Wise, No. 2:08-cv-157 (S.D. Ohio)
Return-Path: <wtemkin@gdhlaw.com>
Delivered-To: cmudd@738414.763001
Received: (gmail 8376 invoked by uid 78); 28 Jul 2009 20:36:08 -0000
Received: from unknown (HELO ns-mr4.netsolmail.com) (10.49.16.163) by 0 with SMTP; 28 Jul 2009 20:36:08 -0000
Received: from gateway.gdhlaw.com (98-177-19-72.skybeam.com [72.19.177.98] (may be forged)) by ns-mr4.netsolmail.com (8.13.6/8.13.6) with ESMTP id n6SKZv5I018411 for <cmudd@muddlawoffices.com>; Tue, 28 Jul 2009 16:35:58 -0400
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X-Ms-Has-Attach: yes
Thread-Topic: Allison v. Wise, No. 2:08-cv-157 (S.D. Ohio)
Thread-Index: AcnzUVfbr6ODJdTRlydm/fRLmRbkQACuHggBuXBq/AAM80SsA==
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<AAC68A09BA47624297D97F04F42C50C1483833@server03>
<DCF87321AC836946974F09FF8390102C052D4396@colmail.bc.internal>

Sabrina,

I am working with my client to obtain some date options. Any deposition of him will need to take place here in Colorado. We will want to depose Mr. Wise as well, and would come to Ohio for that purpose. Can you please get some dates from him that will work in the same general timeframe?

Also, can you clarify the nature of the amended disclosures so we can decide if discovery deadlines need to be extended? I don't think we need to formally amend the scheduling order for the depositions alone as long as we all agree to that extension, but if there will be significant new areas requiring additional written discovery we will need to amend and can discuss the appropriate timeframe.

Thanks,
Wendi

Wendi S. Temkin, Esq.
Garlin Driscoll Howard, LLC
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From: Sabrina Haurin [mailto:sabrina.haurin@baileycavalieri.com]
Sent: Tuesday, July 28, 2009 7:57 AM
To: Wendi Temkin
Cc: cmudd@muddlawoffices.com
Subject: Allison v. Wise, No. 2:08-cv-157 (S.D. Ohio)

Wendi,

As we discussed on the phone yesterday, the discovery cut-off deadline in the above-referenced matter is this Friday, July 31st. If your client is agreeable to continuing to conduct discovery after this deadline, please let us know, and we will reschedule the deposition that has been noticed for this Friday. Please provide us with a few dates upon which Mr. Allison would be available to sit for a deposition within the next few weeks.

Additionally, as I indicated in my e-mail to you last week, our client intends to produce to Plaintiff amended Rule 26(a)(1) initial disclosures and additional documents in this matter this week. As such, it appears that it may be worthwhile to approach the Court about extending the discovery cut-off deadline in this matter by one or two months. If your client would be agreeable to such an extension, I will prepare a motion to amend the case schedule.

Sincerely,
Sabrina Haurin

Bailey Cavaliere LLC
One Columbus
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Direct: (614) 229-3253
General: (614) 221-3155
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Website: www.baileycavaliere.com

From: "Wendi Temkin" <wtemkin@gdhlaw.com>
Date: July 29, 2009 4:16:25 PM CDT
To: "Sabrina Haurin" <sabrina.haurin@baileycavalieri.com>, <cmudd@muddlawoffices.com>
Cc: "Thomas Howard" <thoward@gdhlaw.com>
Subject: RE: Allison v. Wise, No. 2:08-cv-157 (S.D. Ohio)
Return-Path: <wtemkin@gdhlaw.com>
Delivered-To: cmudd@738414.763001
Received: (gmail 20611 invoked by uid 78); 29 Jul 2009 21:16:29 -0000
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References: <DCF87321AC836946974F09FF8390102C052D46CF@colmail.bc.internal>

Charles and Sabrina,

As Charles and I discussed a few minutes ago, we will get back to your before close of business on Friday regarding whether or not to amend the scheduling order based upon these newly filed disclosures. In the interim, can you please provide me with the documents referenced in Disclosure 1.B, paragraphs E, F, G, and I? Thank you.

Wendi

Wendi S. Temkin, Esq.
Garlin Driscoll Howard, LLC
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Louisville, CO 80027

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From: Sabrina Haurin [mailto:sabrina.haurin@baileycavalieri.com]
Sent: Wednesday, July 29, 2009 2:39 PM
To: Thomas Howard; Furniss, Natalie; Wendi Temkin
Cc: cmudd@muddlawoffices.com
Subject: Allison v. Wise, No. 2:08-cv-157 (S.D. Ohio)

Counsel:

Attached to this e-mail is a copy of Defendants' Amended Rule 26(a)(1) Initial Disclosures to Plaintiff in the above-referenced matter. You should receive a hardcopy of this document in the mail shortly.

Sincerely,
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One Columbus
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Columbus, Ohio 43215-3422
Direct: (614) 229-3253
General: (614) 221-3155
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