

Jon Wilson

From: Ryan Shaffer <ryan@mss-lawfirm.com>
Sent: Tuesday, September 27, 2022 6:25 PM
To: Jon Wilson; Joel Taylor; Gerry.Fagan@moultonbellingham.com; Christopher Sweeney
Cc: Rob Stepans; Jessica Yuhas
Subject: NY Depos; Plaintiff Depos

Do you guys have time for a call in the next day or so to discuss depo scheduling and related issues?

As far as Depos in NY on 10/11 and 10/12 go, I am concerned that we are not going to be ready. I understand WTNY's position is that we must notice up all 30b6 topics at one time. If we cannot come to an agreement on that issue, we may need to get some time with the Judge before we go. Additionally, we have been considering adding a couple topics related to corporate hierarchy / organization. We would also like to get Gene Smalley, Gary Breaux and Allen Shuster deposed. This all leaves me uncertain about the presently set dates of 10/11 and 10/12. We may need to look towards Nov.

We are still working on Plaintiffs' availability.

Ariane Rowland in Billings (not sure if 10/31/22 works, hope to know this week);
Cami Mapley remote, possibly on 10/24/22 (Montana), but we are working on logistics of setting up a location in Australia with a video feed that will accommodate a 4:00 am Australian start time (noon Mountain time);
Tracey Caekaert in Missoula (waiting on confirmation for 10/28);
Jamie Schulze in Missoula (late Nov. or early Dec. due to work and other scheduling issues)

With Ms. Caekaert and Ms. Schulze being deposed in Missoula, consider whether you would like them scheduled on consecutive days.

Thanks,

Ryan R. Shaffer



Montana Office:
430 Ryman St.
Missoula, MT 59802
Tel: 406-543-6929
Fax: 406-721-1799

Wyoming Office:
3490 Clubhouse Drive, Suite 104
Wilson, WY 83014
Tel: 307-734-9544
Fax: 307-733-3449

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