

Exhibit A

Ryan Shaffer

From: Christopher Sweeney <Christopher.Sweeney@moultonbellingham.com>
Sent: Tuesday, November 21, 2023 12:22 PM
To: Ryan Shaffer; Jon Wilson; Michael Sarabia; Brett Jensen; jtaylor@mmt-law.com; Gerry Fagan; Jordan W. FitzGerald
Cc: Katy Gannon; Rob Stepans; James Murnion; Matthew Merrill; Jessica Yuhas
Subject: RE: Bruce Mapley Sr.

Ryan –

We don't believe a stipulation is necessary. It can be cleared up in the final pretrial order.

Chris Sweeney
(406) 248-7731

MOULTON BELLINGHAM

From: Ryan Shaffer <ryan@mss-lawfirm.com>
Sent: Monday, November 20, 2023 1:54 PM
To: Christopher Sweeney <Christopher.Sweeney@moultonbellingham.com>; Jon Wilson <jwilson@brownfirm.com>; Michael Sarabia <MSarabia@brownfirm.com>; Brett Jensen <BJensen@brownfirm.com>; jtaylor@mmt-law.com; Gerry Fagan <Gerry.Fagan@moultonbellingham.com>; Jordan W. FitzGerald <Jordan.FitzGerald@moultonbellingham.com>
Cc: Katy Gannon <katy@mss-lawfirm.com>; Rob Stepans <rob@mss-lawfirm.com>; James Murnion <james@mss-lawfirm.com>; Matthew Merrill <matthew@merrillwaterlaw.com>; Jessica Yuhas <jessica@mss-lawfirm.com>
Subject: RE: Bruce Mapley Sr.

Thanks Chris.

It appears that we all agree that the cross claims are not alive. That said, they are identified as cross-claims in Defendants' answers and Plaintiffs want to clean that up. For the purpose of the record, Plaintiffs would like the docket to reflect the parties' agreement that Defendants' cross-claims against Mapley are dead (regardless of whether we call it dismissed / extinguished / or whatever).

I have attached a proposed stipulation. Feel free to make suggestions or edits for us to consider.

Thanks,

From: Christopher Sweeney <Christopher.Sweeney@moultonbellingham.com>
Sent: Monday, November 20, 2023 10:57 AM
To: Ryan Shaffer <ryan@mss-lawfirm.com>; Jon Wilson <jwilson@brownfirm.com>; Michael Sarabia <MSarabia@brownfirm.com>; Brett Jensen <BJensen@brownfirm.com>; jtaylor@mmt-law.com; Gerry Fagan <Gerry.Fagan@moultonbellingham.com>; Jordan W. FitzGerald <Jordan.FitzGerald@moultonbellingham.com>
Cc: Katy Gannon <katy@mss-lawfirm.com>; Rob Stepans <rob@mss-lawfirm.com>; James Murnion <james@mss-lawfirm.com>; Matthew Merrill <matthew@merrillwaterlaw.com>; Jessica Yuhas <jessica@mss-lawfirm.com>
Subject: RE: Bruce Mapley Sr.

Ryan-

Responding to your email below, WTPA's position is that its cross-claims against Bruce Mapley, Sr. were extinguished upon plaintiffs' release of their claims against Mapley, Sr. We will correct in our captions going forward. In discussing with counsel for WTNY, they agree that WTNY's cross-claims against Mapley, Sr. were extinguished as well.

Chris Sweeney
(406) 248-7731

MOULTON BELLINGHAM

From: Ryan Shaffer <ryan@mss-lawfirm.com>
Sent: Monday, November 13, 2023 10:42 AM
To: Jon Wilson <jwilson@brownfirm.com>; Michael Sarabia <MSarabia@brownfirm.com>; Brett Jensen <BJensen@brownfirm.com>; jtaylor@mmt-law.com; Gerry Fagan <Gerry.Fagan@moultonbellingham.com>; Jordan W. FitzGerald <Jordan.FitzGerald@moultonbellingham.com>; Christopher Sweeney <Christopher.Sweeney@moultonbellingham.com>
Cc: Katy Gannon <katy@mss-lawfirm.com>; Rob Stepans <rob@mss-lawfirm.com>; James Murnion <james@mss-lawfirm.com>; Matthew Merrill <matthew@merrillwaterlaw.com>; Jessica Yuhas <jessica@mss-lawfirm.com>
Subject: Bruce Mapley Sr.

Counsel,

We want to address the status of Mr. Mapley as set forth in Defendants' Answers.

The Court has permitted Defendants to assert a settled party defense to Plaintiffs' claims. Doc. 220, 221.

Defendants' current Answers include "Crossclaims" for contribution from Bruce Mapley Sr. and subsequent pleadings identify Mr. Mapley as a Cross-Claim Defendant.

Plaintiffs do not believe that either WTPA or WTNY have cognizable "cross-claims" against Bruce Mapley, Sr.

If you disagree, we intend to file a motion for summary judgment on those asserted claims.

Please let me know your position.

Thanks,

Ryan R. Shaffer



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