

Ex. EE

Subject: RE: Requests to Produce: Production of non-confidential/non-privileged documents?
From: "Jerrie Hayes"
Date: Mon, 21 Apr 2008 15:52:07 -0500
To: "Bob"

In light of Magistrate Hillman's order, Plaintiffs plan on producing copies of the confidential 26(a)(1) documents, in the manner prescribed by the recent Order, on or before May 4, 2008.

As to the documents requested in your written requests for production of documents, I will need to consult with my client as to how long they will need to assemble the confidential documents governed by Magistrate Hillman's protective order, that they have not otherwise objected to on relevance and other grounds. I will advise as soon as I am able about a date for inspection and copying of those materials.

Jerrie Hayes

From: Bob
Sent: Friday, April 18, 2008 2:09 PM
To: Jerrie Hayes
Cc: G. Arthur Joy
Subject: Re: Requests to Produce: Production of non-confidential/non-privileged documents?

Ms. Hayes:

As you will note, I sent you the following on April 9, nine days ago. I have not received a reply thus far.

I was particularly asking about the non-confidential materials that might be produced in response to my requests to produce. Given Magistrate Judge Hillman's order, it would seem appropriate to now try to set up a time to inspect and copy all responsive documents, including the remainder of the documents that were part of the Plaintiffs' initial disclosures.

I tentatively would be able to inspect and copy whatever documents will be available at that point in time next Wednesday, Thursday, and/or possibly, though preferably not, on Friday. Whatever would not be able to be produced by then could be arranged to be inspected and copied at a later time.

Please respond at your earliest convenience so that I can plan accordingly.

Bob Pickle

----- Original Message -----

Subject:Requests to Produce: Production of non-confidential/non-privileged documents?
Date:Wed, 09 Apr 2008 16:15:14 -0500
From:Bob
To:Jerrie Hayes

Ms. Hayes:

I was wondering what sort of notice might be required in order to inspect the non-confidential and non-privileged documents that should be responsive to my requests to produce served last year. For example, items that are a part of public record or that have been published, or for which privilege and confidentiality have been waived, could be produced now.

The latter category would include all evidence documenting Linda Shelton's alleged fornication or adultery, since she specifically requested that this be made public more than one year ago. Her request constitutes such a waiver.

At any rate, I am interested in arranging the copying and inspection of such documents as soon as possible. Please advise.

Bob Pickle