

**Carrie Nance**

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**From:** Ryan Shaffer <ryan@mss-lawfirm.com>  
**Sent:** Friday, September 1, 2023 2:26 PM  
**To:** Christopher Sweeney  
**Cc:** Rob Stepan; Jessica Yuhas; Katy Gannon  
**Subject:** Fwd: Watch Tower  
**Attachments:** image001.png; 8-31-23 Letter to Ryan Shaffer re WTPA's 4th Discovery.pdf

Chris,

Thanks for reconsidering everything.

I'm still bummed we couldn't come to an agreement on rephrasing the interrogatories to take them out of the context of Ninth Circuit pleadings drafted and submitted by Plaintiffs' lawyers.

I did take particular note of your statement that the distinctions between your interrogatories and our suggested rephrasing was without a meaningful difference. While i do not agree with that, i would like to take you up on it: if you are correct and they are truly distinctions without a difference, why don't you rephrase them and then we can get you substantive answers? Please consider this request and let me know by close of business Tuesday (9/5).

Finally, please send over an amended set of requests reflecting the modifications to the RFPs. We will treat them as served on the original date and subject to responses by next Friday (9/8).

Thank you for your continued cooperative efforts.

Best,

Ryan

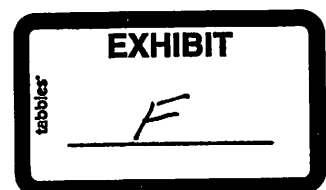
Sent from my iPhone

Begin forwarded message:

**From:** Carrie Nance <Carrie.Nance@moultonbellingham.com>  
**Date:** August 31, 2023 at 1:35:52 PM MDT  
**To:** Ryan Shaffer <ryan@mss-lawfirm.com>, Rob Stepan <rob@mss-lawfirm.com>, James Murnion <james@mss-lawfirm.com>, Katy Gannon <katy@mss-lawfirm.com>, Jessica Yuhas <jessica@mss-lawfirm.com>  
**Cc:** Christopher Sweeney <Christopher.Sweeney@moultonbellingham.com>, Gerry Fagan <Gerry.Fagan@moultonbellingham.com>, "Jordan W. FitzGerald" <Jordan.FitzGerald@moultonbellingham.com>  
**Subject:** Watch Tower

Good afternoon,  
Please see the attached letter from Chris Sweeney. I will mail today as well.

**Carrie Nance**  
Legal Assistant to Afton Ball, Adam Tunning & Chris Sweeney  
**MOULTON BELLINGHAM PC**



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