

**Jon Wilson**

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**From:** Brett Jensen  
**Sent:** Thursday, July 14, 2022 10:14 AM  
**To:** Ryan Shaffer; Jon Wilson; Gerry.Fagan@moultonbellingham.com; Christopher Sweeney; Joel Taylor; bruce\_mapley@yahoo.com  
**Cc:** Jessica Yuhas; Rob Stepans; Matthew Merrill  
**Subject:** RE: Depos

Hi Ryan:

Sorry for the delay. We did discuss this last Friday, and I think generally we are aiming for the first 3 weeks of August and last 2 weeks of September for these proposed depositions. If you could get us some more specific proposed dates in that range, we can work on narrowing things down. WTNY also has some concerns about the parameters of the foundational 30(b)(6) you discuss below. We are further discussing with our client WTNY and will be back with you shortly.

Sincerely,

Brett C. Jensen  
Brown Law Firm, P.C.  
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**From:** Ryan Shaffer <ryan@mss-lawfirm.com>  
**Sent:** Wednesday, July 13, 2022 4:47 PM  
**To:** Jon Wilson <jwilson@brownfirm.com>; Brett Jensen <BJensen@brownfirm.com>; Gerry.Fagan@moultonbellingham.com; Christopher Sweeney <Christopher.Sweeney@moultonbellingham.com>; Joel Taylor <jtaylor@mmt-law.com>; bruce\_mapley@yahoo.com  
**Cc:** Jessica Yuhas <jessica@mss-lawfirm.com>; Rob Stepans <rob@mss-lawfirm.com>; Matthew Merrill <matthew@merrillwaterlaw.com>  
**Subject:** RE: Depos

Hi there,

I just wanted to let you all know that if we do not hear from you on depo dates, we have no option other than to set them unilaterally. That is not what we want to be doing.

Best,

Ryan

**From:** Ryan Shaffer

**Sent:** Wednesday, July 6, 2022 12:40 PM

**To:** Jon Wilson <[jwilson@brownfirm.com](mailto:jwilson@brownfirm.com)>; Brett Jensen <[BJensen@brownfirm.com](mailto:BJensen@brownfirm.com)>;  
Gerry.Fagan@moultonbellingham.com; Christopher Sweeney <[Christopher.Sweeney@moultonbellingham.com](mailto:Christopher.Sweeney@moultonbellingham.com)>; Joel  
Taylor <[jtaylor@mmt-law.com](mailto:jtaylor@mmt-law.com)>; [bruce\\_mapley@yahoo.com](mailto:bruce_mapley@yahoo.com)

**Cc:** Jessica Yuhas <[jessica@mss-lawfirm.com](mailto:jessica@mss-lawfirm.com)>

**Subject:** RE: Depos

Hello,

Please get me some available depo dates in August and September.

Thank you.

Ryan

**From:** Ryan Shaffer

**Sent:** Wednesday, June 29, 2022 5:02 PM

**To:** Jon Wilson <[jwilson@brownfirm.com](mailto:jwilson@brownfirm.com)>; Brett Jensen <[BJensen@brownfirm.com](mailto:BJensen@brownfirm.com)>;  
Gerry.Fagan@moultonbellingham.com; Christopher Sweeney <[Christopher.Sweeney@moultonbellingham.com](mailto:Christopher.Sweeney@moultonbellingham.com)>; Joel  
Taylor <[jtaylor@mmt-law.com](mailto:jtaylor@mmt-law.com)>; [bruce\\_mapley@yahoo.com](mailto:bruce_mapley@yahoo.com)

**Cc:** Jessica Yuhas <[jessica@mss-lawfirm.com](mailto:jessica@mss-lawfirm.com)>

**Subject:** Depos

We would like to find dates for a few depositions:

- Two of them would be in-person, in Billings (Millie Svenson and Yolanda Fraser).
- One of them would likely be remote (Bruce Mapley, Sr.).
- Finally, we want to take the foundational deposition of WTNY, per the Rule 30b6 Notice attached (I am assuming that this one will take place in NY, but let me know if that is not correct).

Please let me know what dates you each have available in August and September for these.

Thanks,

Ryan R. Shaffer



**Meyer, Shaffer  
& Stepan, PLLP**

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