

**From:** [Gregory M. Erickson](#)  
**To:** [Tara Norgard](#)  
**Cc:** [Bill Mohrman](#); [Peter Kohlhepp](#)  
**Subject:** Our Letter Writing Campaign Regarding My Conversations with Clients  
**Date:** Wednesday, June 22, 2011 4:56:54 PM

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Is at an end. I am unable to respond to any of your allegations without divulging details of these conversations which I refuse to do. In regards to Judge Noel's involvement in a mediation, prior to dispositive motion practice, we are happy to participate in mediation prior to preparing dispositive motions. We will need to complete our depositions prior to engaging in any meaningful settlement discussion. In that vein, do you want to contact your investigator to get some acceptable deposition times, or do we need to subpoena him? Also, can you please get some acceptable dates for Mr. Zayed's deposition near the end of July.

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