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January 20, 2023

Mr. Hamel

Considering yesterday's email as an opening to confer, and in light of my prior submission this week pertaining to PLAINTIFF'S FIRST REQUESTS FOR ADMISSIONS & PRODUCTION FOR MADISON J. ADDICKS, I would like to advise of my intention to submit the following requests, and now seek to confer as to whether you object or seek any clarification on the requests.

Please respond by close of business, Friday, 20 January, or I will assume you are opposed;

PLAINTIFF'S FIRST REQUESTS FOR ADMISSIONS & PRODUCTION FOR NICOLE G. ANDREWS;

PLAINTIFF'S FIRST REQUESTS FOR ADMISSIONS & PRODUCTION FOR BENJAMIN "BEN" HAMEL;

PLAINTIFF'S FIRST REQUESTS FOR ADMISSIONS & PRODUCTION FOR JOHN S. SERPE;

PLAINTIFF'S FIRST REQUESTS FOR ADMISSIONS & PRODUCTION FOR MARGARET L. LAYRISSON

and also;

PLAINTIFF's and COUNTER-DEFENDANT's MOTION FOR LEAVE TO DESIGNATE RESPONSIBLE THIRD PARTIES related to your current counterclaim.

Cheers,

Mark Burke

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