

From: [George Donnelly](#)
To: [Christopher A. Bradley, Esq.](#)
Cc: McDonaldM@ballardspahr.com
Subject: Correa Discovery Responses
Date: Tuesday, June 11, 2019 12:53:00 PM

Chris, we have yet to receive updated discovery responses from your clients. Please advise on when we can expect them. We had agreed to twenty days, which expired May 29. We are now more than a month from the hearing.

Thanks.

George Donnelly
Independence Fellow



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From: [George Donnelly](#)
To: [Christopher A. Bradley, Esq.](#)
Cc: McDonaldM@ballardspahr.com
Subject: Depositions and Discovery Responses
Date: Monday, June 17, 2019 1:43:00 PM
Attachments: [ABC Capital Realty dep notice 072219.pdf](#)
[ABC Capital Investments dep notice 072219.pdf](#)
[SAAT Investments dep notice 072219.pdf](#)

Chris,

We are going to postpone Mr. Brooks' deposition until July 22, 2019. Find the updated notices attached.

We still have not received updated discovery responses or any timeline from you on when they will be provided to us. Please advise on this as soon as possible. On Wednesday, we will be forced to file another motion for sanctions and motion to compel.

George

George Donnelly
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