

From: Joey LaHatte <joey@lahattelaw.com>
Sent: Wednesday, October 18, 2017 11:10 AM
To: Kevin P. Riche
Cc: Theresa Daigle; Matthew Monson; Michael Brandner; Scot Koloski; Laura Abel
Subject: RE: Haynes v Americas

Kevin:

Please hold Monday 10/30 for the corporate of America's. I will send you out the revised notice today pursuant to our previous discussions. As it relates to the Odehs, I am no longer in contact with Maria Odeh and/or Nader Anthony Odeh for various reasons. If you do schedule either of their depositions, the location will have to be either at your offices, at the Bar Association, or a neutral location. My firm is not traveling to Mr. Odeh's office on Zenith Street due to safety concerns, so please subpoena their presence elsewhere.

Thanks,
LaHatteLaw

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