

Robert Sullivant <robert@steelandbarn.com>

Deposition for Dr. Perkins

Swayze Alford <salford@swayzealfordlaw.com> To: Robert Sullivant <robert@steelandbarn.com> Cc: Lacey Whitaker < lacey@swayzealfordlaw.com> Thu, Jun 8, 2023 at 10:39 AM

Robert,

I had court today and was at the courthouse and happened to learn that you had filed a deposition subpoena for Dr. Perkins. I did not recall receiving a notice from you so I looked in my email and junk email to be sure that I had not overlooked the notice that is required by the Rules of Civil Procedure. I know that the U.S. Mail moves slowly but I have not received anything in the mail either. If you sent a notice to me, please let me know. It does not appear that a notice was filed with the court. I did review the deposition subpoena which states that the deposition will be taken in Oxford. Dr. Perkins may not object to coming to Oxford, but the Rules of Civil Procedure state that the deposition shall be taken in the county where the deponent is present.

Also, I would like to discuss with you the relevance of Dr. Perkins's testimony at this point. It seems that the issues to which he would testify have been addressed by the Court. Maybe this is something that we can discuss tomorrow. Thanks.

Swayze Alford, Esq.

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