



Robert Sullivant <robert@steelandbarn.com>

Fwd: Conservatorship of Sullivan (Laf Chicanery No 21-512) (our file 02587)

Errol Castens <errol@freelandmartz.com>

Thu, Jun 8, 2023 at 5:06 PM

To: rsullivantjr@gmail.com, "robert@steelandbarn.com" <robert@steelandbarn.com>

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----- Forwarded message -----

From: **Hale Freeland** <hale@freelandmartz.com>

Date: Thu, Jun 8, 2023 at 4:34 PM

Subject: Re: Conservatorship of Sullivan (Laf Chicanery No 21-512) (our file 02587)

To: Swayze Alford <salford@swayzealfordlaw.com>, <roabter@steelandbarn.com>, Errol Castens <errol@freelandmartz.com>

Conservatorship of Sullivan (Laf 2021-612 (W)) Our file 02587

Gentlemen,

Since Mr Alford was not provided notice of the deposition as required by Miss R Civ P 16(b)(1); neither I nor Mr Alford available could appear for a hearing prior to June 22nd due to conflicts in our schedules when on the attached motion to quash may be heard;

Dr Perkins fees have not been paid for taking the deposition;

and no determination was made regarding Dr. Perkins schedule before the subpoena was issued to provide reasonable notice to Dr. Perkins regarding his his schedule was and patient care;

we will set the hearing on our motion to quash (attached) on June 22, 2023 when Judge Whitwell can hear the motion, Mr Alford will be already be before the Court on other matters..

Mr Sullivant noticed the deposition on that date, he does not have a conflict either.

Hale

On Thu, Jun 8, 2023 at 4:02 PM Swayze Alford <salford@swayzealfordlaw.com> wrote:

Got it. Thanks

Sent from my iPhone

> On Jun 8, 2023, at 2:22 PM, Hale Freeland <hale@freelandmartz.com> wrote:

>

> Swazey,

>

> Please find the subpoena to depose Dr Perkins on June 22, 2023. We

> are filing a motion to quash it
>
> Hale
> <Subpoena Dr. Perkins.pdf>

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 **23.06.08 LTT Clerk Enc Mtn to Quash 02587.pdf**
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