Bob Nance

From: Richard Garren
Sent: Thursday, July 06, 2006 3:43 PM
To: 'John Elrod'
Cc: 'fbaker@motelyrice.com'; David Riggs; Bob Nance; lbullock@mkblaw.net
Subject: RE: Edmondson v. Poultry Industry

John,

Since I don't know what your issues are a meet and confer (by phone) would be helpful. If a motion to compel is to be filed then we would need to be sure we have sufficient time to respond (18 days) and if the court wants to set the motion at the same time, given the volume of motions already set, I would simply defer to the court.
Rick

From: John Elrod [mailto:jelrod@cwlaw.com]
Sent: Thursday, July 06, 2006 2:33 PM
To: John Elrod; Richard Garren
Subject: RE: Edmondson v. Poultry Industry

Also, Rick, we will want our motion to be heard the same day as all the others with the understanding that we are looking at Aug 10 or 14 at the moment. Any problem with that with the understanding that you have not seen the motion yet let me know. Thanks.

-----Original Message-----
From: John Elrod
Sent: Thursday, July 06, 2006 2:14 PM
To: 'Richard Garren'
Subject: Edmondson v. Poultry Industry

Re: Simmons 1st set of Interrogatories and Requests to Produce:

Rick, we will be filing Motion to Compel next week. I assume we will be expected to have a meet and confer prior to the filing. I also assume that your objections will continue as your objections regardless of whether we actually discuss. If true, can we agree to dispense with a useless conversation and proceed (not that I don't enjoy talking with you of course). Let me know. Thanks.