Xidis, Claire

From: Jorgensen, Jay T. [jjorgensen@sidley.com]
Sent: Wednesday, January 09, 2008 7:38 PM
To: Xidis, Claire; David Riggs; lbullock@mkblaw.net; David Page; Trevor Hammons; rgarren@riggsabney.com
Cc: Jorgensen, Jay T.; Burns, Bryan; Mark_Quayle@cargill.com; George, Robert W.; James Graves; jgriffin@lathropgage.com; sjantzen@ryanwhaley.com; Gary Weeks; rredemann@pmrlaw.net; vbronson@cwlaw.com; bfreeman@cwlaw.com; dehrich@faegre.com; jelrod@cwlaw.com; rfunk@cwlaw.com; thill@rhodesokla.com; Jones, Tim; Hopson, Mark D.; Bond, Michael R.; rsanders@youngwilliams.com; Terry@thewestlawfirm.com; Webster, Timothy K.; jtucker@rhodesokla.com; pbuchwald@ryanwhaley.com; mantene@ryanwhaley.com; jintermill@faegre.com; vmorgan@cwlaw.com; vrobinson@cwlaw.com; lphillips@cwlaw.com; Sperrazza, Quynh C.; lwhite@rhodesokla.com; gbarber@rhodesokla.com; Lawrence Zeringue; pthompson@bassettlawfirm.com; Dolan, Christopher H.; lrockwood@faegre.com; Jones, Bruce; Scott McDaniel; Nicole Longwell; Jinger Waller; kcarney@faegre.com; jwisley@cwlaw.com; kkobbeman@cwlaw.com; Craig A. Mirkes; Pilkington, Patrick; ljsoutherland@rhodesokla.com; Wicker, Bethany J.
Subject: Oklahoma v. Tyson Foods et al. - Harwood Documents

Claire,

Our preliminary review of the documents produced by plaintiffs in connection with the pending deposition of Dr. Harwood shows that a number of documents are either missing or were provided in an unusable format. By this e-mail defendants request the additional production of the following materials.

1. We are missing the following bates ranges from the set produced to us. Please provide these documents, or in the alternative provide a privilege log describing each document and the reason for plaintiff's failure to produce it.

PI-Harwood00000001-21
PI-Harwood00000041
PI-Harwood00000589-592
PI-Harwood00001152-1167
PI-Harwood00002713-2747

2, The last bates numbered page we have is PI-Harwood00002953. Please confirm that this number is the end of the range, or produce any documents thereafter.

3. Document number PI-Harwood00002851 is a chart which cuts off mid-column such that some portion of the chart is unreadable. Please produce a copy of this chart where all columns fit across single pages.

4. The following documents are charts where columns are broken up across pages making using them difficult. Please produce copies of these charts where all columns fit across single pages as well as an electronic copy of each. PI-Harwood00002199-2202; PI-Harwood00000174-185; PI-Harwood00000203-526; PI-Harwood00000613-616; PI-Harwood00001752-1928; PI-Harwood00002360-2712.

Finally, it is possible that you have sent a complete list of Dr. Harwood's publications, testifying experiences, and her retention contract (including the rate) in this case. If so, I have not seen these materials. Would you confirm that you have provided them or send me copies?

Thank you for your prompt attention to this request.

Sincerely,

Jay

EXHIBIT
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Jay T. Jorgensen | Sidley Austin LLP
1501 K St NW, Washington D.C. 20005 | 202.736.8020

Sidley Austin LLP mail server made the following annotations on 01/09/08, 18:38:55:

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