

R no <totox2@gmail.com>

# FW: [Arnaud Cammas v. YMCA of the East Bay, et al.] Re-scheduling Plaintiff's Deposition

**Michael Slater** <mslater@theslaterlawfirmapc.com> To: Arnaud Cammas <cammasarnaud@gmail.com>

Wed, May 10, 2023 at 3:07 PM

SMH. Let's still talk Friday about the case. - Michael

# **MICHAEL SLATER**

Principal | Partner



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From: Katherine S. Catlos < KCatlos@kdvlaw.com>

Sent: Wednesday, May 10, 2023 3:04 PM

To: Michael Slater <mslater@theslaterlawfirmapc.com>; Gisselle Castillo <gisselle.castillo@kdvlaw.com>; Andres

Roden <aroden@theslaterlawfirmapc.com>

Cc: Emmalee McCarthy <emccarthy@kdvlaw.com>; Alexandra Guardado <aguardado@kdvlaw.com> Subject: RE: [Arnaud Cammas v. YMCA of the East Bay, et al.] Re-scheduling Plaintiff's Deposition

Okay. We will reach out after we receive the subpoenaed records.

#### **Katherine S. Catlos**

Partner, Chief Diversity & Inclusion Officer, CIPP/US, CIPM



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From: Michael Slater <mslater@theslaterlawfirmapc.com>

Sent: Wednesday, May 10, 2023 2:58 PM

To: Katherine S. Catlos <KCatlos@kdvlaw.com>; Gisselle Castillo <gisselle.castillo@kdvlaw.com>; Andres Roden

<aroden@theslaterlawfirmapc.com>

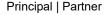
Cc: Emmalee McCarthy <emccarthy@kdvlaw.com>; Alexandra Guardado <aguardado@kdvlaw.com> Subject: RE: [Arnaud Cammas v. YMCA of the East Bay, et al.] Re-scheduling Plaintiff's Deposition

#### [EXTERNAL SENDER]

Katherine.

For months, Defendants have had access to the information it needed to subpoena Plaintiff's medical records. To avoid the additional undue burden and expense of having to do this dance all over again, Defendants should reach out to me with deposition date proposals when they are ready to take Plaintiff's deposition.

# **MICHAEL SLATER**





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3 of 7 12/4/2024, 6:57 PM else is strictly prohibited. IF YOU RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONING THE SENDER NAMED ABOVE AT 818.645.4406. Thank you.

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We do not have plaintiff's medical records yet, and it took time for us to respond to plaintiff's extensive discovery.

#### **Katherine S. Catlos**

Partner, Chief Diversity & Inclusion Officer, CIPP/US, CIPM



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Guardado <aguardado@kdvlaw.com>

Subject: RE: [Arnaud Cammas v. YMCA of the East Bay, et al.] Re-scheduling Plaintiff's Deposition

#### [EXTERNAL SENDER]

Counsel,

This is the second time Defendants have moved Plaintiff's deposition date. The 5/16 date was agreed to by the parties following extensive meet and confer. Plaintiff flew back from Europe for the 5/16 deposition. I have already arranged flights and accommodations for me to attend the 5/16 deposition. What is the reason for this? Respectfully, how can we be sure that any future date agreed to and noticed wont also be changed?

Michael

5 of 7 12/4/2024, 6:57 PM

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From: Gisselle Castillo < gisselle.castillo@kdvlaw.com>

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Guardado <aguardado@kdvlaw.com>

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Hello Counsel,

Please be advised the plaintiff's deposition, scheduled for May 16<sup>th</sup>, will no longer be moving forward. Please provide dates of availability for a future deposition date on the week of May 29<sup>th</sup>.

Thank you,

**Gisselle Castillo** 



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