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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

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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>
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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

Principal | Partner

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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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[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

MICHAEL SLATER

Principal | Partner

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From: Gisselle Castillo <gisselle.castillo@kdvlaw.com>**Sent:** Wednesday, May 10, 2023 2:44 PM**To:** Michael Slater <mslater@theslaterlawfirmapc.com>; Andres Roden <aroden@theslaterlawfirmapc.com>**Cc:** Katherine S. Catlos <KCatlos@kdvlaw.com>; Emmalee McCarthy <emccarthy@kdvlaw.com>; Alexandra Guardado <aguardado@kdvlaw.com>**Subject:** [Arnaud Cammas v. YMCA of the East Bay, et al.] Re-scheduling Plaintiff's Deposition

Hello Counsel,

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

Thank you,

Gisselle Castillo

Legal Assistant / Paralegal



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