

**Jenny Kim**

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**From:** Tom Bunn  
**Sent:** Tuesday, January 07, 2014 10:29 PM  
**To:** Rich Zimmer  
**Cc:** Brad Weeks; Christine Carson; Doug Evertz ; Eric Garner; Jeffrey Dunn; John Tootle; Keith Lemieux; Steve Orr; Warren Wellen; Wayne Lemieux; Jenny Kim  
**Subject:** Expert depositions

Rich,

I saw your meet and confer letter. My objection was based on the fact that Wildermuth has already been deposed. You need leave of court to depose him again. If you disagree, send me your legal authority.

Tom

Thomas S. Bunn III  
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## Jenny Kim

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**From:** Richard Zimmer <RZimmer@clifford-brownlaw.com>  
**Sent:** Thursday, January 09, 2014 7:37 PM  
**To:** Tom Bunn  
**Cc:** Brad Weeks; Christine Carson; Doug Evertz ; Eric Garner; Jeffrey Dunn; John Tootle; Keith Lemieux; Steve Orr; Sue Hays; Warren Wellen; Wayne Lemieux; Jenny Kim  
**Subject:** RE: Expert depositions

Tom,

Thank you for the clarification in your objection that Wildermuth did no work related to return flows. Subject to confirmation that no work of Wildermuth will be used by you or any other purveyor at the Phase 5 trial, we probably will not need to take his deposition. I will confirm this with other attorneys who are interested in the return flow issue.

**From:** Tom Bunn [<mailto:TomBunn@lagerlof.com>]  
**Sent:** Tuesday, January 07, 2014 10:29 PM  
**To:** Richard Zimmer  
**Cc:** Brad Weeks; Christine Carson; Doug Evertz ; Eric Garner; Jeffrey Dunn; John Tootle; Keith Lemieux; Steve Orr; Warren Wellen; Wayne Lemieux; Jenny Kim  
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## Tom Bunn

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**From:** Tom Bunn  
**Sent:** Monday, January 13, 2014 12:42 PM  
**To:** Rich Zimmer  
**Cc:** cms@eslawfirm.com; 'Brad Weeks'; 'Christine Carson'; 'Doug Evertz '; 'Eric Garner'; 'Jeffrey Dunn'; 'John Tootle'; 'Keith Lemieux'; 'Steve Orr'; 'Warren Wellen'; 'Wayne Lemieux'  
**Subject:** Meet and confer

Hi Rich,

I read your latest letter, and it has not changed my position that you need leave of court to redepose these witnesses.

Tom

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**Jenny Kim**

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**From:** Tom Bunn  
**Sent:** Monday, January 13, 2014 7:54 PM  
**To:** Rich Zimmer  
**Cc:** Jenny Kim  
**Subject:** Your interrogatories

Rich,

You and I are getting to be regular correspondents. Contrary to your letter, Palmdale Water District served a timely response to your interrogatories today. Let me know if you have any concerns.

Tom

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