

Subj: **FW: Kramer adv. Kelman -- Declaration/deposition**  
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FYI

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**From:** David Aronoff  
**Sent:** Thursday, December 06, 2007 1:33 PM  
**To:** 'MoldLawyer@aol.com'  
**Subject:** Kramer adv. Kelman -- Declaration/deposition

Kelly --

Can we wrap up the declaration that we were working on some weeks ago in the above matter? If not, will you stipulate to voluntarily sit for your deposition?

Unless we can reach agreement on one of these alternatives, we will probably have little choice but to proceed more formally by way of subpoena and we'll start preparing the papers necessary to obtain a commission and to submit a petition for issuance of a subpoena in Washington.

If we are required to proceed formally, we'll probably also concurrently set the depositions of Paul Haynes and Susan Roberts -- both of whom were also sources for Sharon's press release regarding the Haynes trial.

We'd like to set these depositions, if it proves necessary to do so, during the first half of January.

Look forward to hearing from you. Best regards, DA

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