

Burhans Jr., Glenn T. (Shld-Tal-LT)

From: Kathy Harris [HarrisKC@HillsboroughCounty.ORG]
Sent: Wednesday, October 17, 2007 5:26 PM
To: Burhans Jr., Glenn T. (Shld-Tal-LT)
Cc: Abbuhl, Christine (Secy-Tal-LT)
Subject: Re: FW: NAACP/Browning: Amended Complaint and AmendedSubpoena

Attachments: Procedures.doc



Procedures.doc (3 MB)

Mr. Burhans: I just answered question (1), no I am not authorized to accept service for Mr. Johnson. However, Mr. Johnson is also available from 9:00 - 11:00 AM, Thursday October 25, 2007. Mr. Johnson will speak to the issues raised by the document request. They are identical to the issues raised in Diaz vs. Browning, which has already been deposed. Documents requested are attached. Thank you very much.

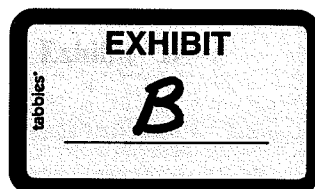
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>>> <BurhansG@gtlaw.com> 10/17/2007 5:01:26 PM >>>
Ms. Harris:

As discussed, attached is a copy of the amended complaint and the subpoena. Please review and advise (1) whether you will accept service; (2) which topics, as raised by the document request, Supervisor Johnson can provide testimony; (3) to the extent Supervisor Johnson cannot speak to issues raised by the document request, identify the employee(s) that we must depose in order to obtain the requested testimony, and (4) when we can expect production of the requested documents.

As we also discussed, we have tentatively set aside Tues. 10/23 and Wed. 10/24, from 3-4:40 each day for the Supervisor's deposition, with Monday



10/29 at 3:00 pm. as a back-up date. As indicated, we expect the deposition to last three hours. I will confirm with you tomorrow whether we can do the 23rd and/or 24th.

Thank you very much.

Glenn T. Burhans, Jr.
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