

LAW OFFICE OF
C. SUKARI HARDNETT

1111 BONIFANT STREET
SILVER SPRING, MARYLAND 20910
s.hardnett@verizon.net
Telephone (301) 587-7001
Facsimile (301) 587-7002

June 10, 2007

VIA FACSIMILE AND ELECTRONIC & US MAIL:

Rhonda C. Fields
Assistant United States Attorney
Judiciary Center Building
555 4th Street, NW
Washington DC 20530

Re: Short v. Chertoff
Civil Action Mo. 05-01034 (RMU)


Dear Ms. Fields:

I am in receipt of the Notice of Deposition that you issued to take the deposition of the Plaintiff. I was quite surprised to receive your notice, for I informed you on June 6, 2007, that I am not available for depositions on June 13, 2007. I notified you of my dates of availability by telephone, and you indicated that you would get back to me. Instead at the twelfth hour, you issued a Notice of Deposition for one of the dates that I previously informed you that I was not available. Your last minute fax and delivery of the deposition notice (which notably does not have a certificate of service) does not constitute reasonable notice under Rule 30(b)(1). Please advise whether you will voluntarily withdraw your notice, or whether I will have to file an emergency motion for protective order.

If you wish to conduct the deposition of the Plaintiff then, as I already discussed with you, we will have to file a consent motion to extend the discovery deadlines to conduct the deposition on one of the dates that I informed you on which I am available. I also intend to conduct depositions of your client's 30(b)(6) designee and other agents and representatives.

Please instruct me how you wish to proceed as soon as possible.

Sincerely yours,


C. Sukari Hardnett, Esq.

