



ATTORNEY GENERAL OF TEXAS
GREG ABBOTT

June 19, 2008

Louis D. Martinez
1004 S. St. Mary's Street
San Antonio, TX 78205

By facsimile and mail: 210-223-1263 (fax)

RE: *Retzlaff v. de la Vina, et al.*, Civil Action No. 5:08-CV-00170-OLG, U.S. District Court for the Western District of Texas (San Antonio Division).

Dear Mr. Martinez:

This is Defendants' final attempt to confer with Plaintiff in setting his deposition for this case, in which you are Mr. Retzlaff's attorney of record. We request dates in late-July 2008 to complete this work. Absent your willingness to confer and reach a reasonable agreement in response to this third repeated request, Defendants will ask the Court to compel the requested deposition setting. Additionally, Defendants ask that Plaintiff now also confer in establishing a reasonable deadline to swap initial disclosures under Rule 26.

Very truly yours,

Lars Hagen
Assistant Attorney General

cc: Liz Mitchell & Gail Jensen, UTSA
Priscilla Lozano, UT System



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ATTORNEY GENERAL OF TEXAS
GREG ABBOTT

May 30, 2008

Louis D. Martinez
1004 S St. Mary's Street
San Antonio, TX 78205

By facsimile and mail: 210-223-1263 (fax)

RE: *Retzlaff v. de la Vina, et al.*, Civil Action No. 5:08-CV-00170-OLG, U.S. District Court for the Western District of Texas (San Antonio Division).

Dear Mr. Martinez:

This is Defendants' second request to confer with Plaintiff in setting his deposition in this case, in which you are Mr. Retzlaff's attorney of record. We request dates in June or July 2008 for this work. Additionally, Defendants ask that Plaintiff also now confer in establishing a deadline to swap initial disclosures under Rule 26.

Very truly yours,

Lars Hagen
Assistant Attorney General

cc: Liz Mitchell & Gail Mitchell, UTSA
Priscilla Lozano, UT System



ATTORNEY GENERAL OF TEXAS
GREG ABBOTT

May 9, 2008

Louis D. Martinez
1004 S St. Mary's Street
San Antonio, TX 78205

By facsimile and mail: 210-223-1263 (fax)

RE: *Retzlaff v. Zhu Lan, et al.*, Cause No. 334173, Bexar County County Court at Law No. 5.
Retzlaff v. de la Vina, et al., Civil Action No. 5:08-CV-00170-OLG, U.S. District Court
for the Western District of Texas (San Antonio Division).
Retzlaff v. Xu, Cause No. 336876, Bexar County Court at Law No. 7.
Retzlaff v. Romo, Cause No. 338313, Bexar County Court at Law No. 3.

Dear Mr. Martinez:

Earlier this week your client directed me a request to begin deposition discovery in one or more of these cases. To that end, please consider dates in June or July 2008 for depositions in *Retzlaff v. de la Vina, et al.*, a case in which each defendant has answered the lawsuit. Please let me know: if there are times you are not available to participate; the witnesses you want to depose, if any; and the time you anticipate needing for each witness. I'll confer with the defendants about their availability and the parties will set a schedule.

In this connection, the parties should also agree to provide one another their Rule 26 disclosures for the federal case by some date before the depositions begin: Defendants suggest June 13 as the deadline for this work, with depositions to begin later that month or in July 2008. Please let me know if you're in agreement here.

Please also know that on May 8 I directed your client a letter that is nearly identical to this one. It's dated May 8, 2008, and was received by Mr. Retzlaff by facsimile transmission on that date. He brought it with him to a hearing on May 9 about *Retzlaff v. Xu* where we discussed it briefly.

Very truly yours,

Lars Hagen
Assistant Attorney General

cc: Liz Mitchell & Gail Mitchell, UTSA
Priscilla Lozano, UT System

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