
From: Park, Brian C.
Sent: Thursday, May 29, 2014 3:26 PM
To: Shellie McGaughey; Peter Nierman; Paul Brain; Jill Davenport
Cc: rtellis@baronbudd.com; Norton, Maren R.; Ferguson, Hunter O.; Park, Brian C.
Subject: FW: Atigeo v. Montgomery, et al.
Attachments: Park 052914.pdf

Shellie:

Thanks for your letter. We are very sorry to hear about Mr. Montgomery's medical issues. Please keep us posted after you have spoken to his doctors and learned more information.

In terms of the deposition of Istvan, we understand he needs to be around his father-in-law in light of the medical issues. We have no desire to take him away from that. At the same time, you understand that we do not want him to renew a motion for summary judgment under the schedule set forth by the Court if he has not allowed Plaintiffs an opportunity to conduct discovery, review documents, or take a deposition. We see that he also served Plaintiffs with his own discovery requests today.

We suggest the following agreement: Mr. Burgyan will not renew his motion for summary judgment until such time as Plaintiffs have had discovery, received/reviewed all responsive documents (including those from Mr. Burgyan's California storage locker), and taken his deposition. And, to the extent that process is delayed, the timetable for Plaintiffs responses to Mr. Burgyan's discovery requests, which seek information about many of those same topics, will likewise be extended. That seems to address both sides concerns in a fair and sensitive manner.

To get the ball rolling, we will plan to serve the notice of deposition of Mr. Burgyan tomorrow along with the Shockey subpoena/notice of deposition, but it will be subject to the proviso that the deposition of Mr. Burgyan will not occur until the parties find a *mutually agreeable* day and time, which we had already agreed to before anyway.

Let us know your thoughts. Thanks.

Best regards,
Brian

From: Katie DeVoe [<mailto:Katie@mcbdlaw.com>]
Sent: Thursday, May 29, 2014 12:33 PM
To: Park, Brian C.; Shellie McGaughey; Peter Nierman; Paul Brain; Jill Davenport
Subject: Atigeo v. Montgomery, et al.

Mr. Park,

Attached please find correspondence from Ms. McGaughey this date. A hard copy will follow via legal messenger.

Thank you,

Katie DeVoe
Paralegal
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Bellevue WA. 98005
Phone: 425-462-4000
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