

From: Little, Joe
Sent: Wednesday, February 8, 2023 9:34 AM
To: Daniel E. Nordby
Subject: Motion to Quash
Attachments: 5694237_EPOS.pdf; Grossman SDT.pdf

Hi Daniel,

I received this morning a proof of service from our process server demonstrating that the second subpoena served on your client was different than the first. I attach the second subpoena here as well as the proof of service.

Moreover, as the opposition I'm preparing to file this AM sets forth, we agree to withdraw Request Nos. 4-7, 9, 11, 13, 16, 18-19, 21, 23-24, and 25. We also agree to limit Request Nos. 10, 12, and 14-15 to the two-year period preceding the July 8, 2022 hearing. For Request No. 8, we agree to limit the communications to those with Drs. Cantor, Van Meter, Van Mol, Lappert, and Donovan, beginning with the two-year period preceding the July 8, 2022 hearing and continuing through August 20, 2022.

In light of these concessions and the attached proof of service, I ask that you withdraw your motion promptly, and that we begin discussions on collecting and producing the significantly narrowed universe of documents.

Best,

Joe

Joe Little | Associate

Pillsbury Winthrop Shaw Pittman LLP
500 Capitol Mall, Suite 1800 | Sacramento, CA 95814-4741
t +1.916.329.4731 | m +1.916.704.4853
joe.little@pillsburylaw.com | website bio

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