

From: [Millie Thompson](#)
To: [Marlena Guajardo](#)
Cc: [Adolfo Ruiz](#); [Cindy Olivari](#); [Patrick Bernal](#)
Subject: Re: FW: Castro v. Salinas - Deposition Date
Date: Tuesday, December 18, 2018 4:00:48 PM

Agreed.

On Tue, Dec 18, 2018 at 3:58 PM Marlena Guajardo <marlena.guajardo@rampage-sa.com> wrote:

Ms. Thompson:

Attached herein is Defendant's Unopposed Motion to Extend Answer Deadline and proposed Order for your review.

Please let us know if we can file.

Thank you,

Marlena Guajardo

Paralegal

Denton Navarro Rocha Bernal & Zech

A Professional Corporation

2517 N. Main Avenue

San Antonio, Texas 78212

(210) 874-6512 Direct

(210) 227-3243 Telephone

(210) 225-4481 Facsimile

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**Exhibit
A**

message and any attachments.

From: Adolfo Ruiz

Sent: Tuesday, December 18, 2018 2:15 PM

To: Millie Thompson <millieaustinlaw@gmail.com>

Cc: Marlena Guajardo <marlena.guajardo@rampage-sa.com>; Cindy Olivarri <cindy.olivarri@rampage-sa.com>; Patrick Bernal <patrick.bernal@rampage-sa.com>

Subject: RE: Castro v. Salinas - Deposition Date

Ok, thanks. I have Marlena prepare those documents as well.



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Adolfo Ruiz

Senior Associate

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From: Millie Thompson [<mailto:millieaustinlaw@gmail.com>]
Sent: Tuesday, December 18, 2018 2:14 PM
To: Adolfo Ruiz <adolfo.ruiz@rampage-sa.com>
Subject: Re: Castro v. Salinas - Deposition Date

I'll agree.

On Tue, Dec 18, 2018 at 2:13 PM Adolfo Ruiz <adolfo.ruiz@rampage-sa.com> wrote:

Millie will you agree to have Defendant's Original Answer due by January 9th. We will prepare a separate agreed motion and order.



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From: Millie Thompson [mailto:millieaustinlaw@gmail.com]

Sent: Tuesday, December 18, 2018 2:09 PM

To: Adolfo Ruiz <adolfo.ruiz@rampage-sa.com>

Cc: Patrick Bernal <patrick.bernal@rampage-sa.com>; Marlina Guajardo <marlena.guajardo@rampage-sa.com>; Cindy Olivarri <cindy.olivarri@rampage-sa.com>

Subject: Re: Castro v. Salinas - Deposition Date

I agree to those dates. Do you want me to draft the joint motion, or do you guys have template to work from?

On Tue, Dec 18, 2018 at 2:08 PM Adolfo Ruiz <adolfo.ruiz@rampage-sa.com> wrote:

I would like to extend our expert designation for 30 days to January 22, 2019

And Dispositive motions 30 days as well to June 1, 2019

The dates for amendment of pleadings and discovery you propose look good.



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From: Millie Thompson [mailto:millieaustinlaw@gmail.com]

Sent: Tuesday, December 18, 2018 2:02 PM

To: Adolfo Ruiz <adolfo.ruiz@rampage-sa.com>

Cc: Patrick Bernal <patrick.bernal@rampage-sa.com>; Marlana Guajardo <marlena.guajardo@rampage-sa.com>; Cindy Olivarri <cindy.olivarri@rampage-sa.com>

Subject: Re: Castro v. Salinas - Deposition Date

Hi Adolfo,

The delay in receiving the order has thrown me off on this case. Can we agree to modify the scheduling order to extend the deadlines as follows:

Amend, supplement, join parties by January 30, 2019;

I'm ok with the expert deadline, but if you want to change it, I'll agree.

Complete Discovery by April 1, 2019.

Please let me know what you think,

Millie

On Tue, Dec 18, 2018 at 11:57 AM Adolfo Ruiz <adolfo.ruiz@rampage-sa.com> wrote:

Millie: We are looking at dates in January for Officer Salinas, we should have those dates soon.

For the Chief, I'll contact the City's Attorney to see how they will handle. I'll let you know.

What dates in January look good for you?

Also, we have 14 days for Defendant to file an answer after the Court's denial of our 12(b) Motion which is Dec 31st.

Would you agree to an agreed motion and order for the parties to amend pleadings by Dec 31st.

Please let me know and I'll have the motion and order drafted and sent to you. Thanks.



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From: Millie Thompson [mailto:millieaustinlaw@gmail.com]

Sent: Monday, December 17, 2018 2:32 PM

To: Patrick Bernal <patrick.bernal@rampage-sa.com>

Cc: Adolfo Ruiz <adolfo.ruiz@rampage-sa.com>

Subject: Castro v. Salinas - Deposition Date

Mr. Bernal,

Can you please send me 5 or 6 proposed dates for Officer Salinas's deposition this month and in January? Please also provide dates that would work for you for the deposition of the Olmos Park police chief.

Are you authorized to set-up the chief's deposition, or should I contact him directly?

Thank you.

--

In Resistance,

Millie L. Thompson, Attorney

Phone: (512) 293-5800 * Fax: (512) 682-8721

Please Note Our New Address: 1411 West Avenue, Ste. 100, Austin, Texas 78701

Privileged Attorney-Client Communication and/or Attorney Work Product

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