

# EXHIBIT I

## Alexz Thompson

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**From:** Julie Wanner <JWanner@JSHFIRM.COM>  
**Sent:** Thursday, May 16, 2019 2:42 PM  
**To:** Alexz Thompson; JOSEPH J. POPOLIZIO; Justin Ackerman  
**Cc:** Jody Broaddus; Melissa Ward  
**Subject:** RE: Wheatcroft v. City of Glendale, et al.  
**Attachments:** Ltr to Broaddus re P.O. ARS 12-511, Deposition Dates-5\_16\_19.pdf

Good Afternoon-

Attached is correspondence from Mr. Popolizio to Ms. Broaddus. The original will not be mailed.

Thank you,

Julie

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JSHFIRM.COM

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1983-2018

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**From:** Alexz Thompson [mailto:alexz@attorneysforfreedom.com]  
**Sent:** Thursday, May 16, 2019 12:50 PM  
**To:** JOSEPH J. POPOLIZIO; Justin Ackerman  
**Cc:** Jody Broaddus; Julie Wanner; Melissa Ward  
**Subject:** Wheatcroft v. City of Glendale, et al.

Counsel:

Attached please find correspondence from Attorney Jody Broaddus and four Notices of Deposition. The originals will follow in the mail.

Thank you,



ATTORNEYS FOR  
**FREEDOM**  
LAW FIRM

**Alexz Thompson**  
Civil Litigation Paralegal

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May 16, 2019

Jody L. Broaddus, Esq.  
Attorneys For Freedom  
3185 South Price Road  
Chandler, AZ 85248

Re: *Wheatcroft v. City of Glendale*

Dear Jody:

Thank you for your letter dated May 9, 2019.

With regard to the workplace harassment reprimand, thank you for agreeing to the protective order pursuant to the officer's request for anonymity. I will send you a draft of a motion for protective for your review.

Thank you for your response to my April 26, 2019 letter addressing Plaintiffs' intent to assert state law claims on behalf of Anya Chapman and Johnny Wheatcroft, I realize that there is an intention to assert state law claims. As you know from my letter, Defendants do not agree to the amendment of the Complaint to assert these contemplated state causes of action and do not agree to conducting discovery on those claims under the assumption that Plaintiffs Johnny Wheatcroft and Anya Chapman are actually entitled to assert state claims if criminal charges occurred. As I indicated, if the FBI's inquiry resulted in criminal charge(s) and a disposition of those charge(s), I do not believe that ARS §12-511(A) would apply and act as a saving statute for Plaintiffs Johnny Wheatcroft and Anya Chapman, who had state claims to assert pursuant to ARS §12-821.01, but failed to comply with its requirements. Again, please let me know if you have found any case law which supports Plaintiffs' contention that it does.

In addition, I have received your notices of depositions for Officer, Schneider, Lindsey, Fernandez, and LaBrant. I certainly appreciate and am grateful for your patience in the setting of these depositions, as I have been extremely busy and tied up with other matters. Unfortunately, the noticed dates do not work. While my calendar is packed for the next few months, the following dates are available for the following officers:

- June 3-7 for Officers Lindsey and Fernandez, only;
- June 17-18 for Officer Schneider;

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- August 1-2, 5-7, and 13-16 for Officers Schneider, Lindsey and Fernandez

We are trying to obtain dates of availability for Sgt. LaBrant.

Hopefully these dates work for you, as well. Again, thank you for your patience with regard to the setting of these depositions. Please call with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Popolizio', with a large, stylized flourish at the end.

Joseph J. Popolizio  
For the Firm

JJP/mw