

# EXHIBIT M

## **Jody Broaddus**

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**From:** Jody Broaddus  
**Sent:** Friday, July 12, 2019 8:14 AM  
**To:** Julie Wanner; JOSEPH J. POPOLIZIO  
**Cc:** Alexz Thompson; Melissa Ward  
**Subject:** RE: Wheatcroft v. Glendale

Joe:

I have been asking for depositions dates since February but I am not sensing very much cooperation. When we last spoke, you ensured me Schneider's deposition would proceed quickly. Now, it appears nothing can be scheduled until September, which is when our expert disclosure are due.

I've been trying to be patient, but I feel like I'm getting the run-around here. At this point, I believe we need a conference with the Court to discuss the case deadlines and the problems with discovery, including scheduling depositions.

Best regards,  
*Jody L. Broaddus*  
Supervising Civil Attorney



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**From:** Julie Wanner <JWanner@JSHFIRM.COM>  
**Sent:** Thursday, July 11, 2019 5:32 PM  
**To:** Jody Broaddus <jody@attorneysforfreedom.com>; JOSEPH J. POPOLIZIO <Jpopolizio@JSHFIRM.com>  
**Cc:** Alexz Thompson <alexz@attorneysforfreedom.com>; Melissa Ward <MWard@jshfirm.com>  
**Subject:** RE: Wheatcroft v. Glendale

Good Evening-

Just thought I'd follow up regarding Sgt. LaBrant's deposition. Alexz provided the date of August 14<sup>th</sup>, but I don't believe it's been confirmed? Also just a reminder that Sgt. Moody is on military leave until the end of September.

Have a good evening.

Julie

 **JSH**  
JSHFIRM.COM

**CELEBRATING**  
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YEARS  
1983 - 2018

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**From:** Julie Wanner  
**Sent:** Thursday, July 11, 2019 9:42 AM  
**To:** 'Jody Broaddus'; JOSEPH J. POPOLIZIO  
**Cc:** Alexz Thompson; Melissa Ward  
**Subject:** RE: Wheatcroft v. Glendale

Good Morning, Jody-

Due to planned vacations and depositions in another matter, Joe doesn't have availability for depositions until September. Please provide dates that you're available starting September 3<sup>rd</sup> for depositions. I will then reach out to the below listed police personnel to determine their availability as well.

Thank you!

Julie

 **JSH**  
JSHFIRM.COM

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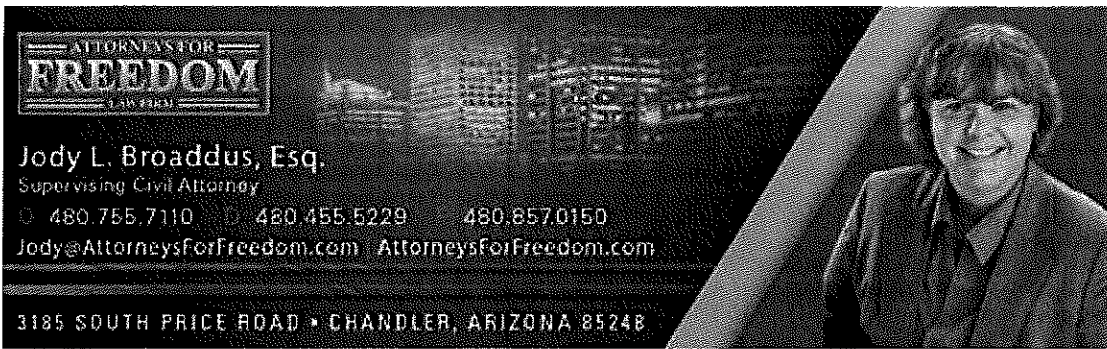
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**From:** Jody Broaddus [mailto:jody@attorneysforfreedom.com]  
**Sent:** Wednesday, July 10, 2019 7:40 AM  
**To:** JOSEPH J. POPOLIZIO  
**Cc:** Alexz Thompson; Julie Wanner; Melissa Ward  
**Subject:** RE: Wheatcroft v. Glendale

Joe:

I am following up on dates for Schneider's deposition, as well as dates for Sgt. Moody, Officer Lacey Tolbert, Lt. Earl Montgomery, Asst. Police Chief Chris Briggs, Asst. Police Chief, Rich LeVander, Police Commissioner Brandon Blanco, and Police Chief Rick St. John. Please advise.

Best regards,  
*Jody L. Broaddus*  
Supervising Civil Attorney



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**From:** JOSEPH J. POPOLIZIO <[jpopolizio@JSHFIRM.com](mailto:jpopolizio@JSHFIRM.com)>  
**Sent:** Monday, July 01, 2019 6:39 PM  
**To:** Jody Broaddus <[jody@attorneysforfreedom.com](mailto:jody@attorneysforfreedom.com)>  
**Cc:** Alexz Thompson <[alexz@attorneysforfreedom.com](mailto:alexz@attorneysforfreedom.com)>; Julie Wanner <[JWanner@JSHFIRM.COM](mailto:JWanner@JSHFIRM.COM)>; Melissa Ward <[MWard@jshfirm.com](mailto:MWard@jshfirm.com)>  
**Subject:** Re: Wheatcroft v. Glendale

Thanks Jody.

Sent from my iPhone

On Jul 1, 2019, at 5:30 PM, Jody Broaddus <[jody@attorneysforfreedom.com](mailto:jody@attorneysforfreedom.com)> wrote:

Two weeks is fine.

**From:** JOSEPH J. POPOLIZIO <[jpopolizio@JSHFIRM.com](mailto:jpopolizio@JSHFIRM.com)>  
**Sent:** Sunday, June 30, 2019 4:46 PM  
**To:** Jody Broaddus <[jody@attorneysforfreedom.com](mailto:jody@attorneysforfreedom.com)>  
**Cc:** Alexz Thompson <[alexz@attorneysforfreedom.com](mailto:alexz@attorneysforfreedom.com)>; Julie Wanner <[JWanner@JSHFIRM.COM](mailto:JWanner@JSHFIRM.COM)>;  
Melissa Ward <[MWard@jshfirm.com](mailto:MWard@jshfirm.com)>  
**Subject:** Wheatcroft v. Glendale

Hi Jody,

I intended to call you at the end of last week, but the days just got away from me.

As you know from communications between our paralegals, I have calls into the union representative regarding the GLEA/FOP decision on Officer Schneider's representation. I just have not heard anything in response to my follow-up communications and messages. I will keep trying. I will be reaching out again to the individual with whom I spoke, and possibly others tomorrow, if I do not hear something tomorrow morning. Thanks for your patience on this important issue.

In addition, I need an extension on the RFP response. I have run into the summer problem—people have been or are now out of the office. I am asking for your professional courtesy for a two week extension.

I look forward to hearing from you. I will be in touch regarding the GLEA/FOP issue.

Thanks and hopefully you are not working right now!

Sincerely,

Joe

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