

EXHIBIT B

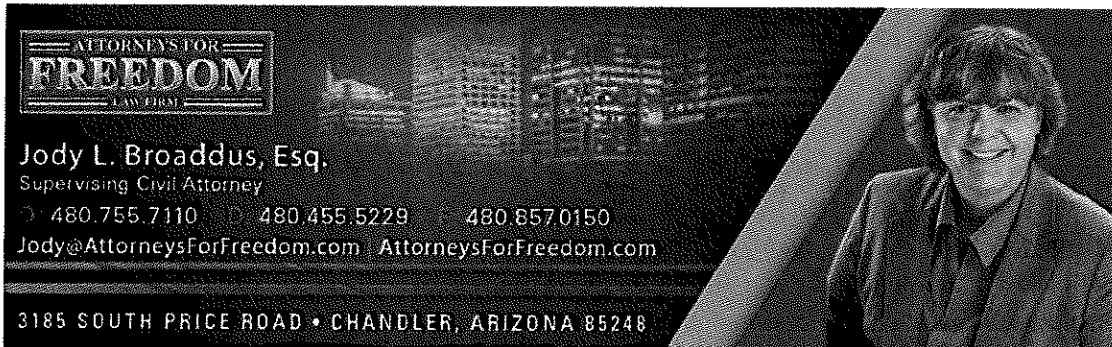
Jody Broaddus

From: Jody Broaddus
Sent: Friday, March 08, 2019 1:48 PM
To: 'JOSEPH J. POPOLIZIO'
Cc: Alexz Thompson; 'Justin Ackerman'; 'Melissa Ward'; 'Julie Wanner'
Subject: RE: Wheatcroft v. Glendale, et. al. - Depositions
Attachments: 20190308 NOD Schneider.pdf; 20190308 NOD Lindsey.pdf; 20190308 NOD Fernandez.pdf

Joe:

I hope you're doing well. I haven't heard back from you regarding my email below. We want to get moving on depositions in this case. Attached are Notices setting the depositions for Matt Schneider, Mark Lindsey, and Michael Fernandez. If these dates do not work, please provide me with other days in April. Thanks.

Best regards,
Jody L. Broaddus
Supervising Civil Attorney



The contents of this message, together with any attachments, are intended only for the use of the individual or entity to which they are addressed and may contain information that is legally privileged, confidential and exempt from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this message, or any attachment, is strictly prohibited. If you have received this message in error, please notify the original sender or Attorneys for Freedom Law Firm at (480) 755-7110, immediately by telephone or by return e-mail and delete this message, along with any attachments, from your computer. Thank you.

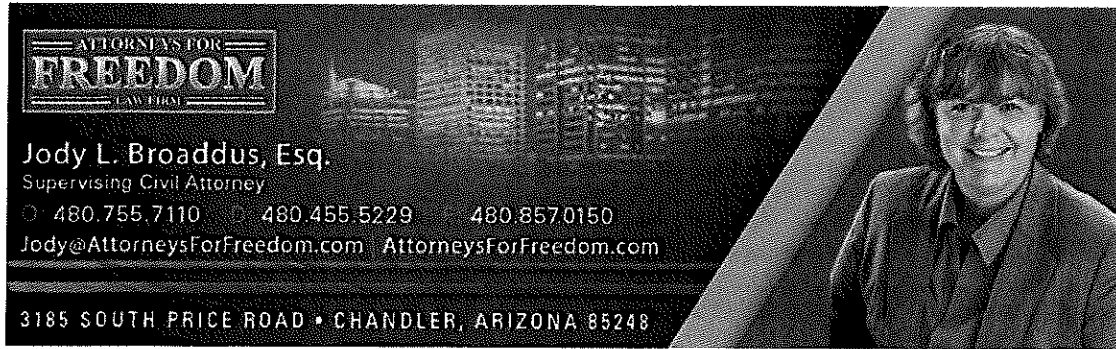
From: Jody Broaddus
Sent: Monday, February 25, 2019 2:42 PM
To: 'JOSEPH J. POPOLIZIO' <Jpopolizio@JSHFIRM.com>
Cc: Alexz Thompson <alexz@attorneysforfreedom.com>; Justin Ackerman <JAckerman@JSHFIRM.COM>; Melissa Ward <MWard@jshfirm.com>; Julie Wanner <JWanner@JSHFIRM.COM>
Subject: Wheatcroft v. Glendale, et. al. - Depositions

Joe:

We would like to schedule depositions of Matt Schneider, Mark Lindsey, Michael Fernandez, and Sgt. Don Labrant, who was their supervisor. Please let me know if the following dates will work on your end: April 12, 15, 18, 19, 24, and 25.

Best regards,

Jody L. Broaddus
Supervising Civil Attorney



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1 **Marc J. Victor, SBN 016064**
2 **Jody L. Broaddus, SN 020122**
3 **ATTORNEYS FOR FREEDOM**
4 3185 South Price Road
5 Chandler, Arizona 85248
6 Phone: (480) 755-7110
7 Fax: (480) 857-0150
8 Marc@AttorneyForFreedom.com
9 Jody@AttorneyForFreedom.com
10 *Attorneys for Plaintiffs*

11 **IN THE UNITED STATES DISTRICT COURT**
12 **IN AND FOR THE DISTRICT OF ARIZONA**

13 Johnny Wheatcroft and Anya Chapman, as
14 husband and wife, and on behalf of minors J.
15 W. and B. W.,

16 Plaintiffs,

17 v.

18 City of Glendale, a municipal entity; Matt
19 Schneider, in his official and individual
20 capacities; Mark Lindsey, in his official and
21 individual capacities; and Michael Fernandez,
22 in his official and individual capacities;

23 Defendants.

Case No.: 2:18-cv-02347-SMB

NOTICE OF DEPOSITION

24 **TO: MATTHEW SCHNEIDER**

25 **YOU ARE HEREBY NOTIFIED** that, pursuant to Fed. R. Civ. P. 26 and 30, the
26 deposition will be taken upon oral examination of the person whose name and address are stated
below at the time and place stated below before an officer authorized by law to administer oaths.
If the name is not known, a general description sufficient to identify that person or the particular
classes or groups to which that person belongs is given below:

/ / /


1 **PERSON TO BE EXAMINED:** **Matthew Schneider**
2 **c/o Joseph J. Popolizio**
3 **JONES, SKELTON & HOCHULI, P.L.C.**
4 **40 North Central Avenue, Suite 2700**
5 **Phoenix, Arizona 85004**

6 **DATE/TIME OF DEPOSITION:** **April 12, 2019 at 9:00 a.m.**

7 **PLACE OF DEPOSITION:** **ATTORNEYS FOR FREEDOM**
8 **3185 South Price Road**
9 **Chandler, Arizona 85248**

10 DATED this 8th day of March, 2019.

11 **ATTORNEYS FOR FREEDOM**

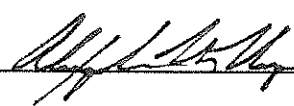
12 By: 
13 **Marc J. Victor, Esq.**
14 **Jody L. Broaddus, Esq.**
15 *Attorneys for Plaintiff*

16 **CERTIFICATE OF MAILING**

17 I hereby certify that on March 8th, 2019, I mailed/mailed this a copy of this document
18 to the following:

19 **Joseph J. Popolizio**
20 **Justin M. Ackerman**
21 **JONES, SKELTON & HOCHULI, P.L.C.**
22 **40 North Central Avenue, Suite 2700**
23 **Phoenix, Arizona 85004**

24 **Berry & Associates**
25 **4032 North Miller Road, Suite A100**
26 **Scottsdale, Arizona 85251**
berry-office@berryreporting.com



1 **Marc J. Victor, SBN 016064**
2 **Jody L. Broaddus, SN 020122**
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5 Chandler, Arizona 85248
6 Phone: (480) 755-7110
7 Fax: (480) 857-0150
8 Marc@AttorneyForFreedom.com
9 Jody@AttorneyForFreedom.com
10 *Attorneys for Plaintiffs*

11 **IN THE UNITED STATES DISTRICT COURT**
12 **IN AND FOR THE DISTRICT OF ARIZONA**

13 Johnny Wheatcroft and Anya Chapman, as
14 husband and wife, and on behalf of minors J.
15 W. and B. W.,

16 Plaintiffs,

17 v.

18 City of Glendale, a municipal entity; Matt
19 Schneider, in his official and individual
20 capacities; Mark Lindsey, in his official and
21 individual capacities; and Michael Fernandez,
22 in his official and individual capacities;

23 Defendants.

Case No.: 2:18-cv-02347-SMB

NOTICE OF DEPOSITION

24 **TO: MARK LINDSEY**

25 **YOU ARE HEREBY NOTIFIED** that, pursuant to Fed. R. Civ. P. 26 and 30, the
26 deposition will be taken upon oral examination of the person whose name and address are stated
below at the time and place stated below before an officer authorized by law to administer oaths.
If the name is not known, a general description sufficient to identify that person or the particular
classes or groups to which that person belongs is given below:

/ / /


1 **PERSON TO BE EXAMINED:** Mark Lindsey
2 c/o Joseph J. Popolizio
3 JONES, SKELTON & HOCHULI, P.L.C.
4 40 North Central Avenue, Suite 2700
Phoenix, Arizona 85004

5 **DATE/TIME OF DEPOSITION:** April 15, 2019 at 9:00 a.m.

6 **PLACE OF DEPOSITION:** ATTORNEYS FOR FREEDOM
7 3185 South Price Road
8 Chandler, Arizona 85248

9 DATED this 8th day of March, 2019.

10 ATTORNEYS FOR FREEDOM

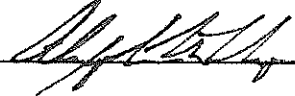
11 By: 
12 Marc J. Victor, Esq.
13 Jody L. Broaddus, Esq.
14 Attorneys for Plaintiff

15 **CERTIFICATE OF MAILING**

16 I hereby certify that on March 8th, 2019, I mailed/mailed this a copy of this document
17 to the following:

18 Joseph J. Popolizio
19 Justin M. Ackerman
20 JONES, SKELTON & HOCHULI, P.L.C.
40 North Central Avenue, Suite 2700
Phoenix, Arizona 85004

21 Berry & Associates
22 4032 North Miller Road, Suite A100
23 Scottsdale, Arizona 85251
24 berry-office@berryreporting.com

25 
26

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2 **Jody L. Broaddus, SN 020122**
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5 Chandler, Arizona 85248
6 Phone: (480) 755-7110
7 Fax: (480) 857-0150
8 Marc@AttorneyForFreedom.com
9 Jody@AttorneyForFreedom.com
10 *Attorneys for Plaintiffs*

11 **IN THE UNITED STATES DISTRICT COURT**
12 **IN AND FOR THE DISTRICT OF ARIZONA**

13 Johnny Wheatcroft and Anya Chapman, as
14 husband and wife, and on behalf of minors J.
15 W. and B. W.,

16 Plaintiffs,

17 v.

18 City of Glendale, a municipal entity; Matt
19 Schneider, in his official and individual
20 capacities; Mark Lindsey, in his official and
21 individual capacities; and Michael Fernandez,
22 in his official and individual capacities;

23 Defendants.

Case No.: 2:18-cv-02347-SMB

NOTICE OF DEPOSITION

24 **TO: MICHAEL FERNANDEZ**

25 **YOU ARE HEREBY NOTIFIED** that, pursuant to Fed. R. Civ. P. 26 and 30, the
26 deposition will be taken upon oral examination of the person whose name and address are stated
below at the time and place stated below before an officer authorized by law to administer oaths.
If the name is not known, a general description sufficient to identify that person or the particular
classes or groups to which that person belongs is given below:

/ / /

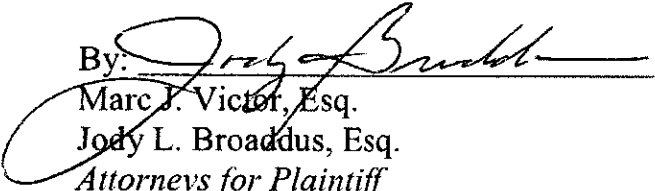
1 **PERSON TO BE EXAMINED:** **Michael Fernandez**
 2 **c/o Joseph J. Popolizio**
 3 **JONES, SKELTON & HOCHULI, P.L.C.**
 4 **40 North Central Avenue, Suite 2700**
 Phoenix, Arizona 85004

5 **DATE/TIME OF DEPOSITION:** **April 18, 2019 at 9:00 a.m.**

6 **PLACE OF DEPOSITION:** **ATTORNEYS FOR FREEDOM**
 3185 South Price Road
 Chandler, Arizona 85248

7 DATED this 8th day of March, 2019.

8 ATTORNEYS FOR FREEDOM

9
10 By: 
 11 Marc J. Victor, Esq.
 12 Jody L. Broadus, Esq.
 Attorneys for Plaintiff

13 **CERTIFICATE OF MAILING**

14
15 I hereby certify that on March 8th, 2019, I mailed/mailed this a copy of this document
 16 to the following:

17 Joseph J. Popolizio
 Justin M. Ackerman
 18 **JONES, SKELTON & HOCHULI, P.L.C.**
 19 **40 North Central Avenue, Suite 2700**
 Phoenix, Arizona 85004

20 Berry & Associates
 21 4032 North Miller Road, Suite A100
 22 Scottsdale, Arizona 85251
 berry-office@berryreporting.com

23 
 24 _____
 25
 26