

File

Badger Flats Gazette

Monday, August 25, 2008

Mr. Benjamin Ratliff
Weakley Ratliff Arendt & McGuire LLP
1630 East Shaw Avenue, Suite #176
Fresno, CA 93710

FAXED ONLY

Re: #150880

Dear Mr. Ratliff:

I write this letter in response to your letter dated August 25th, 2008 which is replete with inaccurate statements. The first I will point out, and will reserve comment upon all of the other areas, is your proffering that Mr. Clinton Galloway is avoiding service. Not so, and quite frankly you are a blatant liar.

Now, I could have used more eloquent words such as disingenuous or mistaken to describe what you are doing but that would go along with your ruse of being an ethical attorney. You are not.

With that said, you will find attached two letters to you from Mr. Galloway indicating that he in no way has been avoiding your service and has been in communication with you. You have in fact served him late notice each time. You also have not responded to Mr. Galloway by phone. Mr. Galloway will make himself available on September 25th, 2008 in Los Angeles, and I will make myself available for you for the remainder of the day of the 25th, in Los Angeles and continue onto the following day if necessary on September 26th, 2008.

As far as your taking the deposition of Ms. Eileen Forte, she will not be voluntarily produced and I request that prior to your issuing such subpoena you provide me an outline of what area you believe you are going to question my spouse upon. The purpose of an advance meet and confer upon the matter is that I will file a Motion to Quash your subpoena of her.

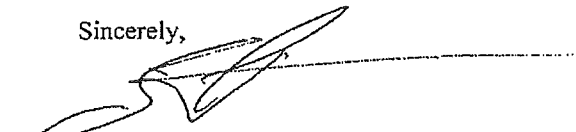
I have no problem in producing Mr. Jordan Forte for deposition provided there are reasonable questions asked. The second you in any way attempt to badger Master Forte, I will call an end to the deposition and seek an order from the court pinning your ears back and asking the awarding of your tail by way of sanctions.

On another note, consider this a meet and confer requesting that you voluntarily limit your request to my medical records or state the relevance of my medical records when I was 6 years old. If you do not do so, I will seek an order from the court quashing such subpoena.

Provide me also with available dates for the taking of the deposition of all of the deponents you have been notice of except for Mr. Charles Guest. Mr. Guest's deposition is unmovable and will be kept for September 4th, 2008.

Your prompt response is requested.

Sincerely,



Gene Forte

Encl: Galloway letters to Ratliff