

Badger Flats Gazette

Wednesday, August 27, 2008

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

FAXED

Re: Response to letter of August 27th, 2008

Dear Mr. Ratliff:

I write this letter in response to your fax this morning received at 10:16AM. It does not appear to be a response to my courtesy fax copy to you of the communications between myself, Mr. Karl Olson and your co-counsel Mr. James Harrison.

Let me make this clear once again. Ms. Eileen Forte will not provide you any dates to have her deposition taken and I will file a Motion to Quash any deposition subpoena served upon her. You are also informed that you will need to serve Mr. Jordan Forte with a subpoena so there is a clear record on file with the court that it is you who wanted to depose him. You may do so by having your process server contact me at 209-829-1116 and I will arrange for Master Jordan to be present at home after school so that service can be easily done. I will do the same for Ms. Forte.

I will not stipulate to your having access to all of my medical records after my 21st birthday. The objections of burdensome, oppressive, invasion of privacy and irrelevant come to mind. Perhaps, we could enter into a stipulation? You can obtain all of my medical records from birth (as you are now asking for) provided that Mayor Jones produces all his medical records evidencing any treatments for drug and alcohol abuse or attendance at AA meetings?

With that said, I suggest that you arrange for Ms. Forte and Master Forte to be served with their subpoenas in the process that I suggested above. I will then file the appropriate Motions for Protective Orders and Motions to Quash on their depositions and upon the medical records that you are seeking.

Consider this a meet and confer to be responded to be 11:00AM August 28th, 2008.

Thank you.

Sincerely,


Gene Forte