

# Badger Flats Gazette

Monday, September 22nd, 2008

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

FAXED ONLY

Re: #150880//Jordan Forte Deposition

Dear Mr. Ratliff:

I write this letter as a response to your letter of September 22<sup>nd</sup>, 2008 concerning your taking the deposition of my son, Master Jordan Forte.

It should take you no longer than 15 minutes to assess the credibility of my son especially when you have been exposed to the polar opposite of honesty by having sat through a deposition of your client Tommy Jones for two days. It is quite evident that you intend to go far afield from asking questions pertaining to what Master Jordan witnessed on May 5<sup>th</sup>, 2007 which were commemorated in his declaration.

With that said, I would agree to take my protective order off calendar under the following conditions:

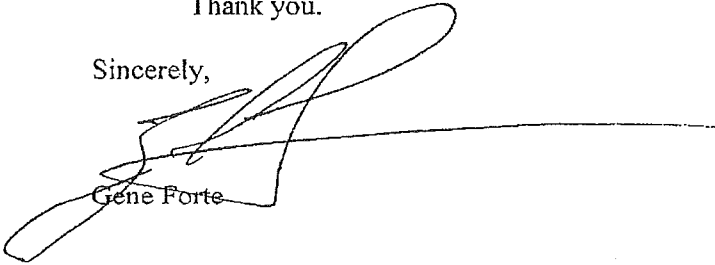
1. The deposition would be taken only on a Saturday with Tommy Jones' insurance company burdening the full expense. I will not pay for any added expense of a weekend deposition. Your proffering that your client is burdening any expense out of his own pocket is utter clap-trap.
2. The questions would be strictly limited to the events Master Jordan witnessed on May 5<sup>th</sup>, 2007 and the content of his declaration.
3. The deposition would be limited to a maximum of 1 ½ hours<sup>1</sup>.
4. I would waive service of a deposition subpoena provided that we agree in advance what Saturday Master Jordan would be made available for his deposition.

If you agree to the above conditions, please let me know. If not, the Motion for Protective Order will not be removed from calendar.

On another matter, your office was to provide to the court clerk a letter confirming that the next case management conference was to be scheduled in either January or February 2009 as requested by Judge Hanson. I have not received any correspondence in regards to such. Please inform me of the status.

Thank you.

Sincerely,



Gene Forte

<sup>1</sup> If it varied by 10-15 minutes Master Jordan would not walk out of the deposition.

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### Fax

**To:** Mr. Benjamin Ratliff      **From:** Mr. Gene Forte

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**Date:** 9/22/2008      **Pages:** 2 (Including Cover Sheet)

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**Subject:** CU150880/Jordan Forte Deposition

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**Notes:**