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Michael A. Erlinger, Of Counsel
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May 11, 2015

**VIA Santa Clara County Superior Court's
Electronic Filing System**

TO ALL COUNSEL

Re: *Cilker Apartments, LLC v. Western National Construction, et al.*
Our File No.: 2120.188

Dear Counsel:

Please accept this correspondence as Defendant Western National Construction's ("WNC") meet and confer correspondence in accordance with Paragraph 8 of the April 14, 2015 Case Management Order Number 2 ("CMO") in this matter.

The CMO provides for percipient witnesses depositions to proceed from June 1, 2015 to July 31, 2015. Accordingly, please provide available deposition dates for your client's PMK witness which fall within the following appropriate ranges:

Party	Range of Dates
Plaintiff	06/01/15 – 06/12/15
Defendant Western National Construction	06/15/15 – 06/19/15
Cross-defendant Subcontractors	06/22/15 – 07/31/15
All Other Parties and Design Professionals	07/06/15 – 07/31/15

Please provide your PMK witness's availability before May 19, 2015. Thereafter, WNC will circulate a proposed PMK deposition schedule. In the meantime, should you wish to discuss the foregoing, please do not hesitate to contact me.

Sincerely,



Michael A. Erlinger

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