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February 12, 2016

VIA SCSC E-SERVICE

ALL COUNSEL

Re: Cilker Apartments, LLC v. Western National Construction, et al.
Our File Number: 19010

Dear Counsel:

This letter is to express McLarand, Vasquez & Partners, Inc.'s joinder in Mr. Danskin's letter regarding the deposition of Mr. Avelar, scheduled to begin on Tuesday, February 16, 2016. MVP, and all other parties, would be significantly prejudiced by the deposition of Mr. Avelar going forward next Tuesday, based on the tens of thousands of documents that were produced by Plaintiff on the Friday before a holiday weekend. Accordingly, MVP will not appear for the deposition on Tuesday and will move to exclude any testimony given. If necessary, MVP will move for an ex parte Order to this effect.

Very truly yours,

COLLINS COLLINS MUIR + STEWART LLP

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SBL:pak

cc: All Counsel; Bruce Edwards