

Exhibit B

From: [David Lane](#)
To: [Ratner, Mark S.](#); [Andrew McNulty](#); [Jamie Akard](#); [Marion, Nicole](#); [Helen Oh](#)
Cc: [Reffett, Sarah](#)
Subject: Re: Michaela Surat v. Randal Klamser, et al, 19-cv-00901-WJM-NRN -- Attached Notice of Deposition of Plaintiff
Date: Wednesday, February 5, 2020 1:24:20 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

The “positive” reason for their presence is that Michaela wants their support.

David Lane
Attorney
Killmer, Lane & Newman, LLP
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dlane@kln-law.com

“As nightfall does not come all at once, neither does oppression. In both instances, there is a twilight when everything remains seemingly unchanged. And it is in such twilight that we all must be most aware of change in the air — however slight — lest we become unwitting victims of the darkness.”

Justice William O. Douglas

From: "Ratner, Mark S." <ratnerm@HallEvans.com>
Date: Wednesday, February 5, 2020 at 1:23 PM
To: Andrew McNulty <amcnulty@kln-law.com>, Jamie Akard <jakard@kln-law.com>, "Marion, Nicole" <marionn@hallekans.com>, Helen Oh <HOH@kln-law.com>, David Lane <dlane@kln-law.com>
Cc: "Reffett, Sarah" <reffetts@hallekans.com>
Subject: RE: Michaela Surat v. Randal Klamser, et al, 19-cv-00901-WJM-NRN -- Attached Notice of Deposition of Plaintiff

Andy, I agree we have both been extending professional courtesies. And, I hope to continue to do so.

But, the request for Ms. Surat’s parents is unusual and I cannot think of any positive reason for their attendance. I will ask, nonetheless.

Mark S. Ratner | Special Counsel
ratnerm@HallEvans.com
Tel: 303-628-3337

Hall & Evans, LLC

Exhibit B

1001 Seventeenth Street, Suite 300
Denver, CO 80202



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[website](#) | [bio](#) | [LinkedIn](#)

From: Andrew McNulty <amcnulty@kln-law.com>
Sent: Wednesday, February 5, 2020 11:17 AM
To: Ratner, Mark S. <ratnerm@HallEvans.com>; Jamie Akard <jakard@kln-law.com>; Marion, Nicole <marionn@hallevans.com>; Helen Oh <HOH@kln-law.com>; David Lane <dlane@kln-law.com>
Cc: scheduling@planetdepos.com; Reffett, Sarah <reffetts@hallevans.com>
Subject: RE: Michaela Surat v. Randal Klamser, et al, 19-cv-00901-WJM-NRN -- Attached Notice of Deposition of Plaintiff

Mark,

Ms. Surat's parents would like to attend Officer Klasmer's deposition. I am hopeful that you will not object to this eminently reasonable request. Thus far, I feel like we have both been willing extend professional courtesies. I hope that continues.

Thanks,

Andy McNulty
He/Him/His
Killmer, Lane & Newman, LLP
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amcnulty@kln-law.com
(303) 571-1000

From: Ratner, Mark S. <ratnerm@HallEvans.com>
Sent: Monday, January 27, 2020 6:38 AM
To: Jamie Akard <jakard@kln-law.com>; Marion, Nicole <marionn@hallevans.com>; Andrew McNulty <amcnulty@kln-law.com>; Helen Oh <HOH@kln-law.com>; David Lane <dlane@kln-law.com>
Cc: scheduling@planetdepos.com; Reffett, Sarah <reffetts@hallevans.com>
Subject: RE: Michaela Surat v. Randal Klamser, et al, 19-cv-00901-WJM-NRN -- Attached Notice of Deposition of Plaintiff

Officer Klamser is available February 17, 18, 24, 25, 27, and 28.

- Mark

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From: Jamie Akard <jakard@kln-law.com>

Sent: Thursday, January 23, 2020 4:21 PM

To: Marion, Nicole <marionn@hallevans.com>; Andrew McNulty <amcnulty@kln-law.com>; Helen Oh <HOH@kln-law.com>; David Lane <dlane@kln-law.com>

Cc: Ratner, Mark S. <ratnerm@HallEvans.com>; scheduling@planetdepos.com; Reffett, Sarah <reffetts@hallevans.com>

Subject: RE: Michaella Surat v. Randal Klamsner, et al, 19-cv-00901-WJM-NRN -- Attached Notice of Deposition of Plaintiff

Thank you. Has there been any progress with availability for Officer Klamsner?

Jamie Akard

Paralegal

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From: Marion, Nicole <marionn@hallevans.com>

Sent: Thursday, January 23, 2020 4:19 PM

To: Andrew McNulty <amcnulty@kln-law.com>; Helen Oh <HOH@kln-law.com>; Jamie Akard <jakard@kln-law.com>; David Lane <dlane@kln-law.com>

Cc: Ratner, Mark S. <ratnerm@HallEvans.com>; scheduling@planetdepos.com; Reffett, Sarah <reffetts@hallevans.com>

Subject: Michaella Surat v. Randal Klamsner, et al, 19-cv-00901-WJM-NRN -- Attached Notice of Deposition of Plaintiff

Good Afternoon, please see attached Notice of Deposition for Plaintiff for Friday, 2/14/20. Thank you

Nicole Marion | Legal Assistant

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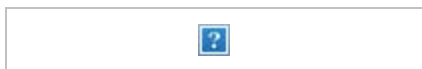
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