

From: [Andrew McNulty](#)
To: [Ratner, Mark S.](#); [David Lane](#); [Helen Oh](#); [Jamie Akard](#)
Cc: [Tamborello, Amber](#); [Reffett, Sarah](#); [Dale, Gillian](#); [Desmond, Brenden](#)
Subject: Re: Surat
Date: Thursday, March 5, 2020 3:07:49 PM
Attachments: [image002.png](#)
[HELogo-600_1647bba9-82b6-4878-b39e-e05e65e25e7e.png](#)

Mark,

We oppose.

Thanks,

Andy

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From: Ratner, Mark S. <ratnerm@HallEvans.com>
Sent: Thursday, March 5, 2020, 1:42 PM
To: David Lane; Helen Oh; Andrew McNulty; Jamie Akard
Cc: Tamborello, Amber; Reffett, Sarah; Dale, Gillian; Desmond, Brenden
Subject: RE: Surat

Good Afternoon, David.

As before, the client objects to Ms. Surat's parents attending the deposition. We intend on filing another motion for protective order, so when you have a moment, please let me know your position.

Best Regards,

- Mark

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

Hall & Evans, LLC
1001 Seventeenth Street, Suite 300
Denver, CO 80202



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

From: David Lane <dlane@kln-law.com>

Sent: Wednesday, March 4, 2020 9:52 AM

To: Ratner, Mark S. <ratnerm@HallEvans.com>; Helen Oh <HOH@kln-law.com>; Andrew McNulty <amcnulty@kln-law.com>; Jamie Akard <jakard@kln-law.com>

Cc: Tamborello, Amber <tamborelloa@hallevans.com>; Reffett, Sarah <reffetts@hallevans.com>; Dale, Gillian <daleg@hallevans.com>; Desmond, Brenden <desmondb@hallevans.com>

Subject: Re: Surat

Her parents may be there.

David Lane
Attorney
Killmer, Lane & Newman, LLP
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Denver, Colorado 80202
(303) 571-1000
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, March 4, 2020 at 8:45 AM

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

Cc: "Tamborello, Amber" <tamborelloa@hallevans.com>, "Reffett, Sarah" <reffetts@hallevans.com>, "Dale, Gillian" <daleg@hallevans.com>, "Desmond, Brenden" <desmondb@hallevans.com>

Subject: Surat

Good Morning.

With respect to Ms. Surat's upcoming deposition, can you please let me know if you intend on having her parents or anyone else not associated with your Firm, at the deposition?

Best Regards,

- Mark

Mark S. Ratner | Special Counsel
ratnerm@HallEvans.com

Exhibit B

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