

Paula McKnight

From: Bo Rainey
Sent: Thursday, September 10, 2009 4:13 PM
To: 'Denise James'
Cc: Paula McKnight
Subject: RE: Sisney v. Broken Arrow School District; Case No. 09-CV-253-TCK-PJC, N.D. OKLA

Dear Ms. James:

I am sorry, but I do not believe that simply a promise to supplement at some unspecified future time is sufficient to be in compliance with the Court's initial disclosure requirements. As I explained in my letter, I am under an affirmative duty to apprise the court of the plaintiff's failure to comply with his initial disclosure requirements. Therefore and unless we can reach an agreement in the immediate future as to a specific date when this supplementation will occur, I will have to file an appropriate motion with the court. I will be in my office all afternoon to discuss this matter. Thank you.

Bo Rainey
Rosenstein, Fist & Ringold
525 S. Main Ste 700
Tulsa, Oklahoma 74103
(918) 585-9211
(918) 583-5617 - facsimile
borainey@rfrlaw.com

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From: Denise James [mailto:DPJ@RRBLAWOK.COM]
Sent: Thursday, September 10, 2009 4:04 PM
To: Bo Rainey
Subject: RE: Sisney v. Broken Arrow School District; Case No. 09-CV-253-TCK-PJC, N.D. OKLA

Mr. Rainey,

I have received only one message and was told just now that you called a second time. I apologize for any delay. We do intend to supplement the disclosure, as per your request and our agreement. I will be in touch when I receive the appropriate supplementation.

Thanks,
Denise

Denise P. James
Richardson Richardson Boudreaux
6450 South Lewis Avenue, Suite 300
Tulsa, Oklahoma 74136



9/11/2009

Telephone: (918) 492-7674
Facsimile: (918) 493-1925

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From: Bo Rainey [mailto:borainey@rfrlaw.com]
Sent: September 10, 2009 3:58 PM
To: Denise James
Cc: Paula McKnight
Subject: RE: Sisney v. Broken Arrow School District; Case No. 09-CV-253-TCK-PJC, N.D. OKLA

Dear Ms. James:

Over the last week and a half, I have left three phone messages for you, none of which has been returned. To date, I still have not been presented any supplement to the plaintiff's initial disclosures regarding calculation of damages. Unless we are able to speak regarding this matter in the immediate future and reach an agreement on this matter, I will be left no choice but to file an appropriate motion with the court regarding the plaintiff's failure to comply with his initial disclosure requirements.

I look forward to hearing from you.

Bo Rainey
Rosenstein, Fist & Ringold
525 S. Main Ste 700
Tulsa, Oklahoma 74103
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From: Denise James [mailto:DPJ@RRBLAWOK.COM]
Sent: Thursday, August 27, 2009 2:51 PM
To: Paula McKnight
Cc: Bo Rainey; Chuck Richardson
Subject: RE: Sisney v. Broken Arrow School District; Case No. 09-CV-253-TCK-PJC, N.D. OKLA

We agree to supplement this Disclosure, as per your request. However, we can not guaranty it will be by close of business Monday, as it requires some fairly specific calculations.

Thanks,
D. James

9/11/2009

Denise P. James

Richardson Richardson Boudreaux

6450 South Lewis Avenue, Suite 300

Tulsa, Oklahoma 74136

Telephone: (918) 492-7674

Facsimile: (918) 493-1925

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From: Paula McKnight [mailto:pmcknight@rflaw.com]

Sent: August 26, 2009 4:11 PM

To: Denise James

Cc: Bo Rainey

Subject: Sisney v. Broken Arrow School District; Case No. 09-CV-253-TCK-PJC, N.D. OKLA

Attached please find Mr. Kent B. Rainey's letter dated 8/26/09 along with the enclosure.

If you have any questions, please do not hesitate to contact our office.

Paula McKnight

Legal Secretary

Rosenstein, Fist & Ringold

525 S. Main Ste 700

Tulsa, OK 74103

(918) 585-9211

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9/11/2009