

**Paula McKnight**

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**From:** Bo Rainey  
**Sent:** Friday, September 18, 2009 3:06 PM  
**To:** 'Denise James'  
**Cc:** Paula McKnight  
**Subject:** RE: Sisney v. ISD#3

I assumed that you meant the 21<sup>st</sup> by your earlier e-mail. I look forward to receiving the supplement.

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

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**From:** Denise James [mailto:DPJ@RRBLAWOK.COM]  
**Sent:** Friday, September 18, 2009 3:06 PM  
**To:** Bo Rainey  
**Subject:** Sisney v. ISD#3

Bo,

I have noticed that September 20 is a Sunday. Please allow until the following Monday, September 21, for the rule 26 damages supplement.

Thanks,  
Denise

**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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9/18/2009

## Bo Rainey

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**From:** Denise James [DPJ@RRBLAWOK.COM]  
**Sent:** Thursday, September 10, 2009 4:57 PM  
**To:** Bo Rainey  
**Subject:** RE: Sisney v. Broken Arrow School District; Case No. 09-CV-253-TCK-PJC, N.D. OKLA

Mr. Rainey,

The Plaintiff agrees to supplement the computation of damages within ten days, or by September 20. If this is agreeable, please so notify.

Thanks,  
D. James

**Denise P. James**  
**Richardson Richardson Boudreaux**  
6450 South Lewis Avenue, Suite 300  
Tulsa, Oklahoma 74136  
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**From:** Bo Rainey [mailto:borainey@rfrlaw.com]  
**Sent:** 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  
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10/5/2009