

EXHIBIT B

11/29/18 E-Mail from R.J. Cronkhite

Michael Bonvolanta

From: James Tamm
Sent: Wednesday, December 05, 2018 8:56 AM
To: Michael Bonvolanta
Subject: FW: Deposition notices



O'Connor | DeGrazia | Tamm | O'Connor, P.C.
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James E. Tamm
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From: R.J. Cronkhite [mailto:RCronkhite@maddinhauser.com]
Sent: Thursday, November 29, 2018 9:01 AM
To: James Tamm <jetamm@odtlegal.com>
Cc: Carolyn Rowland <cmrowland@odtlegal.com>; Richard Stokan <rvstokan@odtlegal.com>
Subject: Re: Deposition notices

Jim,

1) You have stated you are unavailable for a 2.5 month period. This is a third party deposition, and your attendance is not necessary. Further, you are acutely aware of how time sensitive this case is. Waiting 2.5 months isn't realistic or necessary. Please have Richard or another attorney at your office provide earlier availability.

2) Mike Darga requested the same items from his October letter, but now dropped the topography survey. I appreciate the shifting requirements (third shift now), but none of the October requirements are legitimate. HRC is also capable of performing the calculations it seeks.

R.J.

On Nov 29, 2018, at 7:57 AM, James Tamm <jetamm@odtlegal.com> wrote:

Mr. Cronkhite,

In the short term, my availability is very limited. I have out of state depositions tomorrow and on December 19-21 as well as multiple other previously scheduled matters in between. On January 7, I start a 5 week trial in front of Judge Hala Jarbou in the Oakland County Circuit Court. I am available in February on the following days: February 11,14,18,19,20,and 25.

It is also my understanding that Mike Darga had communicated with Boss Engineering about responding to the 3 issues raised in the October 8 review letter. Do you know the status of the response from Boss?

<image001.png>

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From: R.J. Cronkhite [mailto:RCronkhite@maddinhauser.com]
Sent: Wednesday, November 28, 2018 8:36 PM
To: James Tamm <jetamm@odtlegal.com>
Cc: Carolyn Rowland <cmrowland@odtlegal.com>; Richard Stokan <rvstokan@odtlegal.com>
Subject: Re: Deposition notices

Jim,

If you're going to object to my scheduling of a third party deposition, and cite courtesy rules to me, please have the courtesy of providing your availability. I shouldn't have to ask for this once you state a date doesn't work.

R.J.

Sent from the road.

On Nov 28, 2018, at 8:12 AM, James Tamm <jetamm@odtlegal.com> wrote:

Mr. Cronkhite,

I am not available on December 17, the date that you noticed the depositions of the Mamos. No effort was made to see if I was available before the depositions were notice. Please contact me in advance of scheduling depositions so that I can be present. Of course I will extend to you the same courtesy. It is also mandated by Paragraph 14 of the Civility Principles adopted by the United States District Court for the Eastern District of Michigan that you consult with opposing

counsel regarding scheduling matters to avoid scheduling conflicts. Given the upcoming holidays and pre-existing obligation, a phone call or email in advance of scheduling a deposition would be greatly appreciated.

<image001.png>

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