

**Exhibit P**

**11/19/18 Stokan E-Mail**

**Richard Stokan**

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**From:** R.J. Cronkhite <RCronkhite@maddinhauser.com>  
**Sent:** Tuesday, November 27, 2018 8:15 PM  
**To:** Richard Stokan  
**Cc:** Carolyn Rowland; James Tamm  
**Subject:** RE: Hack v. Milford - Request for Concurrence

Richard,

This order is unacceptable. Why do you need to hold ex parte meetings with providers? You can notice up a deposition.

I'll provide my revisions shortly.

R.J.

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**From:** Richard Stokan [<mailto:rvstokan@odtlegal.com>]  
**Sent:** Monday, November 19, 2018 10:57 AM  
**To:** R.J. Cronkhite  
**Cc:** Carolyn Rowland; James Tamm  
**Subject:** RE: Hack v. Milford - Request for Concurrence

R.J.,

Pursuant to the discussion this morning attached is a proposed Qualified Protective Order to allow meetings with treating physicians. I only included Mr. Hack in the order. Please advise whether Mrs. Hack will be asserting any claims for damages relating to her physical or mental health and I will draft a separate identical order to cover her treating physicians.



O'Connor | DeGrazia | Tamm | O'Connor, P.C.  
Attorneys At Law

Sincerely,

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