

From: chris brown <chris.brown@wyo.gov>
Sent: Monday, February 25, 2013 8:29 AM
To: John B. Draper
Cc: James Kaste; Anders, Jennifer; Jeffrey Wechsler; peter michael
Subject: Re: Montana v. Wyoming and North Dakota

John,

We met and discussed your proposal. Without more information, we think the schedule is simply too tight as a result of our previous agreement to extend it any further, and 60 days is more than ample time to prepare what will necessarily be the very limited rebuttal reports. Talk to you at noon.

Chris

On Fri, Feb 22, 2013 at 9:04 AM, John B. Draper <JDraper@montand.com> wrote:
James and Chris,

I am writing regarding the dates that were jointly proposed to the Special Master for expert reports and discovery, which we hope to discuss during Monday's conference. It has come to our attention that Mr. Book has professional and personal commitments, of which we were previously unaware, which will make the current Montana rebuttal disclosure date very difficult. To avoid conflicts and ensure Mr. Book has enough time to complete his work, we would like to build in an extra 2 weeks of time into the proposed schedule. If you are willing, the fairest way to accomplish this seems to be to give each State an additional week in which to complete its expert reports. Other dates would need to be adjusted accordingly, but it would still allow an October trial. Below is our revised proposal for your consideration:

Wyoming Expert Disclosures:	April 9 (changed from April 2)
Montana Rebuttal Disclosures:	June 18 (changed from June 4)
Last Day for Written Discovery:	June 25 (changed from June 11)
Disclosure of Non-Expert Witnesses:	June 25 (changed from June 11)
Last Day for Depositions:	July 12 (changed from June 28)
Final Day for Dispositive Motions:	July 19 (changed from July 3)

Please advise as to whether you are willing to agree to these changes. Both Jeff and I are out of the office today, but we are available to discuss on Monday morning before the status conference.

We appreciate your consideration.

Best regards -

John

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