



Jason Marx <jmarx@halemonico.com>

In Re Watts, 19-1717-Notice of Deposition (Celeste Stack)

14 messages

Valerie Barajas <valerie@loevy.com>

Wed, May 29, 2024 at 12:16 PM

To: Taylor Atwater <atwatert@jbltd.com>, Anthony Zecchin <azecchin@halemonico.com>, Dhaviella Harris <dharris@burnsnoland.com>, dneville@burnsnoland.com, Daniel Burns <dburns@burnsnoland.com>, "Daniel M. Noland" <dnoland@burnsnoland.com>, Elizabeth Ekl <eekl@burnsnoland.com>, Elena Favela <Elena@borkanscahill.com>, Eric Palles <epalles@mohangroble.com>, Frank Rocco <frocco@mohangroble.com>, Fiona Winfrey <fwinfrey@mohangroble.com>, gainerb <gainerb@jbltd.com>, Gianna Gizzi <gizzi@loevy.com>, Gary Ravitz <gravitz@daleymohan.com>, Raymond Groble <groble@daleymohan.com>, gutowskim <gutowskim@jbltd.com>, Hannah Beswick-Hale <hannah@halemonico.com>, Wally Hilke <hilke@loevy.com>, Izeta Causevic <icausevic@halemonico.com>, Joel Flaxman <jaf@kenlaw.com>, Jim Daffada <jim@ilesq.com>, Jason Marx <jmarx@halemonico.com>, Josh Tepfer <josh@loevy.com>, jrs@ilesq.com, Kevin Zibolski <kevin@ilesq.com>, "Katherine C. Morrison" <kmorrison@burnsnoland.com>, Kenneth Flaxman <knf@kenlaw.com>, Kelly Olivier <kolivier@halemonico.com>, Lisa Altukhova <lisaa@mohangroble.com>, Lohith Ramanujam <lo@halemonico.com>, mavitia@burnsnoland.com, Mirzeta Causevic <mcausevic@halemonico.com>, "Lisa M. McElroy" <mcelroyl@jbltd.com>, Aleeza Mian <miana@jbltd.com>, "Rebecca A. Milton" <miltonr@jbltd.com>, "Michael J. Schalka" <mjs@ilesq.com>, Megan McGrath <mkm@ilesq.com>, "Paul A. Michalik" <pmichalik@burnsnoland.com>, Steven Borkan <sborkan@borkanscahill.com>, Scott Rauscher <scott@loevy.com>, Sean Starr <sean@loevy.com>, shafia@jbltd.com, Sean Sullivan <ssullivan@mohangroble.com>, "Terrence M. Burns" <tburns@burnsnoland.com>, Tim Scahill <tscahill@borkanscahill.com>, Theresa Kleinhaus <tess@loevy.com>, Thomas Leinenweber <thomas@ilesq.com>, William Bazarek <web@halemonico.com>, Lilia Martinez <martinez@loevy.com>

Counsel:

Attached, please find a Notice of Deposition for Celeste Stack. Zoom details to follow.

Sincerely,

--

Valerie Barajas (she/her/ella)



Office: (312) 243-5900 / Direct: (312) 948-5564

311 N Aberdeen St, Chicago, IL 60607

www.loevy.com

2024.05.29 NOSD Stack 06.04.2024.pdf

144K

Valerie Barajas <valerie@loevy.com>

Thu, May 30, 2024 at 3:35 PM

To: Taylor Atwater <atwatert@jbltd.com>, Anthony Zecchin <azecchin@halemonico.com>, Dhaviella Harris <dharris@burnsnoland.com>, dneville@burnsnoland.com, Daniel Burns <dburns@burnsnoland.com>, "Daniel M. Noland" <dnoland@burnsnoland.com>, Elizabeth Ekl <eekl@burnsnoland.com>, Elena Favela <Elena@borkanscahill.com>, Eric Palles <epalles@mohangroble.com>, Frank Rocco <frocco@mohangroble.com>, Fiona Winfrey <fwinfrey@mohangroble.com>, gainerb <gainerb@jbltd.com>, Gianna Gizzi <gizzi@loevy.com>, Gary Ravitz <gravitz@daleymohan.com>, Raymond Groble <groble@daleymohan.com>, gutowskim <gutowskim@jbltd.com>, Hannah Beswick-Hale <hannah@halemonico.com>, Wally Hilke <hilke@loevy.com>, Izeta Causevic <icausevic@halemonico.com>, Joel Flaxman <jaf@kenlaw.com>, Jim Daffada <jim@ilesq.com>, Jason Marx <jmarx@halemonico.com>, Josh Tepfer <josh@loevy.com>, jrs@ilesq.com, Kevin Zibolski <kevin@ilesq.com>, "Katherine C. Morrison" <kmorrison@burnsnoland.com>, Kenneth Flaxman <knf@kenlaw.com>, Kelly Olivier <kolivier@halemonico.com>, Lisa Altukhova <lisaa@mohangroble.com>, Lohith Ramanujam <lo@halemonico.com>, mavitia@burnsnoland.com, Mirzeta Causevic <mcausevic@halemonico.com>, "Lisa M. McElroy" <mcelroyl@jbltd.com>, Aleeza Mian <miana@jbltd.com>, "Rebecca A. Milton" <miltonr@jbltd.com>, "Michael J. Schalka" <mjs@ilesq.com>, Megan McGrath <mkm@ilesq.com>, "Paul A. Michalik" <pmichalik@burnsnoland.com>, Steven Borkan <sborkan@borkanscahill.com>, Scott Rauscher <scott@loevy.com>, Sean Starr <sean@loevy.com>, shafia@jbltd.com, Sean Sullivan <ssullivan@mohangroble.com>,

"Terrence M. Burns" <tburns@burnsnoland.com>, Tim Scahill <tscahill@borkanscahill.com>, Theresa Kleinhaus <tess@loevy.com>, Thomas Leinenweber <thomas@ilesq.com>, William Bazarek <web@halemonico.com>, Lilia Martinez <martinez@loevy.com>

Counsel:

Below are the Zoom details for Ms. Stack's deposition.

Topic: 99310 - Celeste Stack

Time: Jun 4, 2024 10:00 AM Eastern Time (US and Canada)

Join Zoom Meeting

<https://us06web.zoom.us/j/82273872389>

Meeting ID: 822 7387 2389

Dial-in: 1-929-205-6099

Sincerely,

[Quoted text hidden]

Josh Tepfer <josh@loevy.com>

Thu, May 30, 2024 at 3:51 PM

To: Valerie Barajas <valerie@loevy.com>

Cc: Taylor Atwater <atwatert@jbltd.com>, Anthony Zecchin <azecchin@halemonico.com>, Dhaviella Harris <dharris@burnsnoland.com>, dneville@burnsnoland.com, Daniel Burns <dburns@burnsnoland.com>, "Daniel M. Noland" <dnoland@burnsnoland.com>, Elizabeth Ekl <eekl@burnsnoland.com>, Elena Favela <Elena@borkanscahill.com>, Eric Palles <epalles@mohangroble.com>, Frank Rocco <frocco@mohangroble.com>, Fiona Winfrey <fwinfrey@mohangroble.com>, gainerb <gainerb@jbltd.com>, Gianna Gizzi <gizzi@loevy.com>, Gary Ravitz <gravitz@daleymohan.com>, Raymond Groble <groble@daleymohan.com>, gutowskim <gutowskim@jbltd.com>, Hannah Beswick-Hale <hannah@halemonico.com>, Wally Hilke <hilke@loevy.com>, Izeta Causevic <icausevic@halemonico.com>, Joel Flaxman <jaf@kenlaw.com>, Jim Daffada <jim@ilesq.com>, Jason Marx <jmarx@halemonico.com>, jrs@ilesq.com, Kevin Zibolski <kevin@ilesq.com>, "Katherine C. Morrison" <kmorrison@burnsnoland.com>, Kenneth Flaxman <knf@kenlaw.com>, Kelly Olivier <kolivier@halemonico.com>, Lisa Altukhova <lisaa@mohangroble.com>, Lohith Ramanujam <lo@halemonico.com>, mavitia@burnsnoland.com, Mirzeta Causevic <mcausevic@halemonico.com>, "Lisa M. McElroy" <mcelroyl@jbltd.com>, Aleeza Mian <miana@jbltd.com>, "Rebecca A. Milton" <miltonr@jbltd.com>, "Michael J. Schalka" <mjs@ilesq.com>, Megan McGrath <mkm@ilesq.com>, "Paul A. Michalik" <pmichalik@burnsnoland.com>, Steven Borkan <sborkan@borkanscahill.com>, Scott Rauscher <scott@loevy.com>, Sean Starr <sean@loevy.com>, shafia@jbltd.com, Sean Sullivan <ssullivan@mohangroble.com>, "Terrence M. Burns" <tburns@burnsnoland.com>, Tim Scahill <tscahill@borkanscahill.com>, Theresa Kleinhaus <tess@loevy.com>, Thomas Leinenweber <thomas@ilesq.com>, William Bazarek <web@halemonico.com>, Lilia Martinez <martinez@loevy.com>

Given that Judge Finnegan just scheduled a status at noon on this date, we would like to move this deposition. I can do it either June 5 or 6. Please let me know.

[Quoted text hidden]

--

Joshua Tepfer (He/Him)

 LOEVY+ LOEVY

Office: (312) 243-5900

[Quoted text hidden]

Jason Marx <jmarx@halemonico.com>

Thu, May 30, 2024 at 4:09 PM

To: Josh Tepfer <josh@loevy.com>

Cc: Valerie Barajas <valerie@loevy.com>, Taylor Atwater <atwatert@jbltd.com>, Anthony Zecchin <azecchin@halemonico.com>, Dhaviella Harris <dharris@burnsnoland.com>, dneville@burnsnoland.com, Daniel Burns <dburns@burnsnoland.com>, "Daniel M. Noland" <dnoland@burnsnoland.com>, Elizabeth Ekl <eekl@burnsnoland.com>, Elena Favela <Elena@borkanscahill.com>, Eric Palles <epalles@mohangroble.com>, Frank Rocco <frocco@mohangroble.com>, Fiona Winfrey <fwinfrey@mohangroble.com>, gainerb <gainerb@jbltd.com>, Gianna Gizzi <gizzi@loevy.com>, Gary Ravitz <gravitz@daleymohan.com>, Raymond Groble <groble@daleymohan.com>, gutowskim <gutowskim@jbltd.com>, Hannah Beswick-Hale <hannah@halemonico.com>, Wally Hilke <hilke@loevy.com>, Izeta Causevic <icausevic@halemonico.com>, Joel Flaxman <jaf@kenlaw.com>, Jim Daffada <jim@ilesq.com>, jrs@ilesq.com, Kevin Zibolski <kevin@ilesq.com>, "Katherine C. Morrison" <kmorrison@burnsnoland.com>, Kenneth Flaxman <knf@kenlaw.com>, Kelly Olivier <kolivier@halemonico.com>, Lisa Altukhova <lisaa@mohangroble.com>, Lohith

Ramanujam <lo@halemonico.com>, mavitia@burnsnoland.com, Mirzeta Causevic <mcausevic@halemonico.com>, "Lisa M. McElroy" <mcelroyl@jbltd.com>, Aleeza Mian <miana@jbltd.com>, "Rebecca A. Milton" <miltonr@jbltd.com>, "Michael J. Schalka" <mjs@ilesq.com>, Megan McGrath <mkm@ilesq.com>, "Paul A. Michalik" <pmichalik@burnsnoland.com>, Steven Borkan <sborkan@borkanscahill.com>, Scott Rauscher <scott@loevy.com>, Sean Starr <sean@loevy.com>, shafia@jbltd.com, Sean Sullivan <ssullivan@mohangroble.com>, "Terrence M. Burns" <tburns@burnsnoland.com>, Tim Scahill <tscahill@borkanscahill.com>, Theresa Kleinhaus <tess@loevy.com>, Thomas Leinenweber <thomas@ilesq.com>, William Bazarek <web@halemonico.com>, Lilia Martinez <martinez@loevy.com>

Hi Josh,

I am presenting Celeste. We could have her deposition:

1. 6/4 at 10:00am, take a two hour break, resume at 2:00pm
2. 6/5, but I can't start until 2:00pm, as I'm deposing Jerome Bynum at 10:00am
3. 6/6, but I can't start until 2:00pm, as I have another deposition at 10:00am
4. 6/7 anytime

Thoughts?



Jason Marx

Attorney

(312) 870-6912 | jmarx@halemonico.com

[Quoted text hidden]

Josh Tepfer <josh@loevy.com>
To: Jason Marx <jmarx@halemonico.com>

Thu, May 30, 2024 at 4:13 PM

Thanks for your flexibility. Let me get back to you tomorrow.
I might want to run something else by you but I have to check on something. But any of those options might work out fine (with the exception of 6/4 at 10 am but we may be able to just start at 2 pm).

[Quoted text hidden]

Josh Tepfer <josh@loevy.com>
To: Jason Marx <jmarx@halemonico.com>

Thu, May 30, 2024 at 4:35 PM

Actually, I can chat now -- I have a proposal that could potentially obviate the need for Ms. Stack's deposition at all.
Do you have a minute to chat -- my cell is [REDACTED].

[Quoted text hidden]

Jason Marx <jmarx@halemonico.com>
To: Josh Tepfer <josh@loevy.com>

Thu, May 30, 2024 at 4:36 PM

I'll give you a call now.



Jason Marx

Attorney

(312) 870-6912 | jmarx@halemonico.com

[Quoted text hidden]

Jason Marx <jmarx@halemonico.com>
To: Josh Tepfer <josh@loevy.com>

Fri, May 31, 2024 at 5:16 PM

Hi Josh,

I know it's after 5:00p.m., but do you have a minute to chat?



Jason Marx

Attorney

(312) 870-6912 | jmarx@halemonico.com

[Quoted text hidden]

Josh Tepfer <josh@loevy.com>
To: Jason Marx <jmarx@halemonico.com>

Fri, May 31, 2024 at 5:44 PM

I could talk for like a minute now but then am tied up for awhile. If you need a minute tomorrow I can do that. My cell [REDACTED]

[Quoted text hidden]

Jason Marx <jmarx@halemonico.com>
To: Josh Tepfer <josh@loevy.com>

Fri, May 31, 2024 at 5:45 PM

It should be brief, I'll call you now



Jason Marx

Attorney

(312) 870-6912 | jmarx@halemonico.com

[Quoted text hidden]

Jason Marx <jmarx@halemonico.com>

Fri, May 31, 2024 at 7:22 PM

To: Josh Tepfer <josh@loevy.com>

Ok Josh.

Instead of stating: "I have no independent recollection of conducting any additional investigation regarding *People v. Ben Baker*, 05 CR 8982-01";

Celeste agrees to say: "I did not conduct any additional investigation regarding *People v. Ben Baker*, 05 CR 8982-01."

Everything else I told you stays the same.

Let me know if this is acceptable, and I will send you her Declaration.

Then please advise that you are cancelling her deposition.

Thank you,



Jason Marx

Attorney

(312) 870-6912 | jmarx@halemonico.com

[Quoted text hidden]

Josh Tepfer <josh@loevy.com>

Sat, Jun 1, 2024 at 8:24 AM

To: Jason Marx <jmarx@halemonico.com>

Cc: Scott Rauscher <scott@loevy.com>

Hi Jason,

That works, and I can confirm we will cancel her deposition upon receipt of the declaration.

Thanks,

Josh

[Quoted text hidden]

Jason Marx <jmarx@halemonico.com>

Sat, Jun 1, 2024 at 9:07 AM

To: Josh Tepfer <josh@loevy.com>

Cc: Scott Rauscher <scott@loevy.com>

Ok. See attached Declaration of Celeste Stack.

I will have it bated stamped and produced to everyone when my assistant gets back into the office.

Thanks Josh.



Jason Marx

Attorney

(312) 870-6912 | jmarx@halemonico.com

[Quoted text hidden]

 Declaration of Celeste Stack.pdf
129K

Josh Tepfer <josh@loevy.com>

Mon, Jun 3, 2024 at 11:04 AM

To: Valerie Barajas <valerie@loevy.com>

Cc: Taylor Atwater <atwatert@jbltd.com>, Anthony Zecchin <azecchin@halemonico.com>, Dhaviella Harris <dharris@burnsnoland.com>, dneville@burnsnoland.com, Daniel Burns <dburns@burnsnoland.com>, "Daniel M. Noland" <dnoland@burnsnoland.com>, Elizabeth Ekl <eekl@burnsnoland.com>, Elena Favela <Elena@borkanscahill.com>, Eric Palles <epalles@mohangroble.com>, Frank Rocco <frocco@mohangroble.com>, Fiona Winfrey <fwinfrey@mohangroble.com>, gainerb <gainerb@jbltd.com>, Gianna Gizzi <gizzi@loevy.com>, Gary Ravitz <gravitz@daleymohan.com>, Raymond Groble <groble@daleymohan.com>, gutowskim <gutowskim@jbltd.com>, Hannah Beswick-Hale <hannah@halemonico.com>, Wally Hilke <hilke@loevy.com>, Izeta Causevic <icausevic@halemonico.com>, Joel Flaxman <jaf@kenlaw.com>, Jim Daffada <jim@ilesq.com>, Jason Marx <jmarx@halemonico.com>, jrs@ilesq.com, Kevin Zibolski <kevin@ilesq.com>, "Katherine C. Morrison" <kmorrison@burnsnoland.com>, Kenneth Flaxman <knf@kenlaw.com>, Kelly Olivier <kolivier@halemonico.com>, Lisa Altukhova <lisaa@mohangroble.com>, Lohith Ramanujam <lo@halemonico.com>, mavitia@burnsnoland.com, Mirzeta Causevic <mcausevic@halemonico.com>, "Lisa M. McElroy" <mcelroyl@jbltd.com>, Aleeza Mian <miana@jbltd.com>, "Rebecca A. Milton" <miltonr@jbltd.com>, "Michael J. Schalka" <mjs@ilesq.com>, Megan McGrath <mkm@ilesq.com>, "Paul A. Michalik" <pmichalik@burnsnoland.com>, Steven Borkan <sborkan@borkanscahill.com>, Scott Rauscher <scott@loevy.com>, Sean Starr <sean@loevy.com>, shafia@jbltd.com, Sean Sullivan <ssullivan@mohangroble.com>, "Terrence M. Burns" <tburns@burnsnoland.com>, Tim Scahill <tscahill@borkanscahill.com>, Theresa Kleinhaus <tess@loevy.com>, Thomas Leinenweber <thomas@ilesq.com>, William Bazarek <web@halemonico.com>, Lilia Martinez <martinez@loevy.com>

All,

This deposition is cancelled.

Josh

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--

Joshua Tepfer (He/Him)

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