

EXHIBIT 2

Eric Palles

From: Eric Palles
Sent: Wednesday, November 8, 2023 3:35 PM
To: Josh Tepfer
Subject: RE: Mohammed Deposition

I'd rather speak with you directly, Call me on my cell when you can.

Eric S. Palles | Mohan Groble Scolaro, PC

T 312.422.5534 | **M** 773.633.6674 | **E** epalles@mohangroble.com
55 West Monroe, Ste. 1600, Chicago, IL 60603
www.mohangroble.com

From: Josh Tepfer <josh@loevy.com>
Sent: Wednesday, November 8, 2023 2:53 PM
To: Eric Palles <epalles@mohangroble.com>
Cc: Scott@loevy.com; Gianna Gizzi <gizzi@loevy.com>; Theresa Kleinhaus <tess@loevy.com>; Sean Starr <sean@loevy.com>; Joel Flaxman <jaf@kenlaw.com>
Subject: Re: Mohammed Deposition

Eric,

After court today, I believe you told me that your client will not be on the fifth in any of the below cases.

Given that, please let me know for which cases your client has a memory of the event or the allegations.

Thanks,
Josh

On Wed, Oct 25, 2023 at 11:16 AM Eric Palles <epalles@mohangroble.com> wrote:

I am, of course, completely in your thrall, but I thought Mo was asked about White Sr. (I'll go back and look; it could have been Junior). At this time, I can tell you that he will not take the fifth in Baker/Glenn.

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From: Josh Tepfer <josh@loevy.com>
Sent: Wednesday, October 25, 2023 11:07 AM
To: Eric Palles <epalles@mohangroble.com>
Cc: Scott@loevy.com; Gianna Gizzi <gizzi@loevy.com>; Theresa Kleinhaus <tess@loevy.com>; Sean Starr <sean@loevy.com>
Subject: Re: Mohammed Deposition

Hey Eric,

To be complete, here is what we think is the list of outstanding test case plaintiffs we will ask you about.

1. Chauncey Ali
2. Stefon Harrison
3. Henry Thomas
4. Ben Baker/Clarissa Glenn
5. Bobby Coleman
6. Marc Giles
7. Larry Lomax
8. Clifford Roberts
9. Lionel White Sr.

If you anticipate your client will be on the 5th for each of these matters, and you can confirm that ahead of time, than we can probably do this fairly quickly. I'm expanding the list of recipients here as I'm not sure who is doing the dep yet and I want more people to see how well I charmed you.

Thanks,

Josh

On Fri, Oct 20, 2023 at 9:33 AM Eric Palles <epalles@mohangroble.com> wrote:

I guess I'd have to include 3 "Gipson" plaintiffs- Giles, Lomax and Ollie- if we need to go back over that ground.

Eric S. Palles | Mohan Groble Scolaro, PC

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From: Josh Tepfer <josh@loevy.com>

Sent: Thursday, October 19, 2023 2:20 PM

To: Eric Palles <epalles@mohangroble.com>

Cc: Scott@loevy.com

Subject: Re: Mohammed Deposition

Thanks, Eric. It is nice to know that someone finally recognizes my charm and persuasion far exceed Rauscher's.

I took notes and you said Baker, White, Sr., and Henry Thomas and co-defs were the remaining cases. I'm guessing it is Glenn, too, and you meant that when you said Baker. But let me double check if there are other test cases and will get you the list very shortly.

On Thu, Oct 19, 2023 at 2:16 PM Eric Palles <epalles@mohangroble.com> wrote:

Josh,

I truly enjoyed our recent conversation. Your charm and grace were overwhelming. As a result, I will produce Kallatt Mohammed on November 15th. If there are any remaining target cases other than those we discussed, please let me know.

Eric S. Palles | Mohan Groble Scolaro, PC

T 312.422.5534 | M 773.633.6674 | E epalles@mohangroble.com

55 West Monroe, Ste. 1600, Chicago, IL 60603

www.mohangroble.com

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Joshua Tepfer

Loevy & Loevy

311 N. Aberdeen Street, 3rd Floor

Chicago, IL 60607

312-243-5900

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Joshua Tepfer

Loevy & Loevy

311 N. Aberdeen Street, 3rd Floor

Chicago, IL 60607

312-243-5900

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Joshua Tepfer (He/Him)

 **LOEVY + LOEVY**

Office: (312) 243-5900

311 N Aberdeen St, Chicago, IL 60607

www.loevy.com