

# Exhibit 30

**Tim Scahill**

---

**From:** Joel Flaxman <jaf@kenlaw.com>  
**Sent:** Tuesday, December 3, 2024 11:19 AM  
**To:** Tim Scahill  
**Subject:** Re: Carter MSJ

You're right. See paragraphs 17, 33, and 60 of the complaint.

---

Joel Flaxman  
Law Offices of Kenneth N. Flaxman P.C.  
200 S Michigan Ave, Ste 201  
Chicago, IL 60604  
(312) 427-3200  
(312) 427-3930 (fax)  
[www.kenlaw.com](http://www.kenlaw.com)

On Tue, Dec 3, 2024 at 11:14 AM Tim Scahill <[TScahill@borkanscahill.com](mailto:TScahill@borkanscahill.com)> wrote:

Hey Joel,

We are putting together our MSJ for this case and I just wanted to take a stab at clarifying with you which officers you are suing for which arrests. In particular, my guy, Ridgell, only appears in your complaint in reference to the June 18, 2004 arrest. You can confirm on your own end, but it does not look like Ridgell is on the paperwork or otherwise on scene or involved in the other two (March 3, 2004 and May 19, 2006). I would prefer not to waste my, yours, or the court's time in putting in a personal involvement argument unnecessarily for these two other arrests if I can avoid it. So if you can confirm on that, I would really appreciate it. If this was already confirmed before my involvement, I apologize. Just looking to streamline some things...

Thanks,

Tim

Timothy P. Scahill

Borkan & Scahill, Ltd.

Two First National Plaza

20 South Clark Street

Suite 1700

Chicago, Illinois 60603

Telephone: (312) 580-1030

Fax.: (312) 263-0128