

EXHIBIT 6

Friday, April 4, 2025 at 14:11:09 Central Daylight Time

Subject: RE: Mulero / Mendoza v. Guevara: Joan Roberts
Date: Friday, April 4, 2025 at 10:23:43 AM Central Daylight Time
From: Tim Scahill
To: Carter Grant, Josh M. Engquist, Andrea Checkai, Krystal Gonzalez, John Timbo, Catherine M. Barber, Kara Hutson, Emily Schnidt, Whitney Hutchinson, Kellie Voss, Elena Favela, Christiane Murray, Elise A. Lindsley, Eileen E. Rosen, agrill@rfclaw.com, Austin Rahe, lferrise@rfclaw.com, Theresa B. Carney, kkrauchun@rfclaw.com, sscardamaglia@rfclaw.com, Jim Sotos, Joseph M. Polick, Thomas J. Sotos, George Yamin, Elizabeth R. Fleming, Caroline P. Golden, Alexis M. Gamboa
CC: Joel Flaxman, Antonio Romanucci, Sam Harton, Dana Kondos, Steven Hart, John Marrese, Brian Eldridge, Morgan Forbes, knf@kenlaw.com
Attachments: image001.png

The defense's position is that both parties should be held to the same standards and your offices objected to several depositions proceeding that had been noticed before the discovery cutoff based on the discovery cutoff date. If you remove your objection as to those witnesses (or the court allows those depositions to proceed per our pending motion), we do not object to Ms. Roberts deposition proceeding. Otherwise, Defendants object. Please advise your position on this and, if you do not agree to those terms, please note our above position in your motion.

From: Carter Grant <cgrant@hmelegal.com>
Sent: Thursday, April 3, 2025 4:04 PM
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Does the defense have its position on our request for leave to depose Ms. Roberts? We'd like to get our motion on file by tomorrow.

Thanks.

Carter Grant | Partner



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From: Josh M. Engquist <JEngquist@jsotoslaw.com>

Date: Wednesday, April 2, 2025 at 1:31 PM

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All of defense counsel are talking about that and will get back to you shortly.

In the meantime, can you please get us possible dep dates for your client's new damage witness, Darmaris?

Sincerely,

Josh Engquist

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From: Carter Grant <cgrant@hmelegal.com>

Sent: Tuesday, April 1, 2025 9:57 AM

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Counsel-

As you will recall, we made several attempts to serve Ms. Joan Roberts with a deposition subpoena over a number of months in 2024 and through February 2025. We had assumed that our efforts were all for naught, but Ms. Roberts just recently contacted our office and agreed to sit for a deposition on April 16th.

We intend on filing a motion requesting leave to conduct her deposition on that date. Please advise if we may file the motion as agreed.

Thank you.

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