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October 30, 2023

Mike O'Brien
Mike O'Brien, P.C.
14225 Highway 105
Washington, Texas 77880

**Re: Case No. 2022-11380; *James C. Mastandrea v. David Taylor, et al.*; In the
215th Judicial District Court of Harris County, Texas**

Dear Mike:

As discussed, we propose that the parties agree to the following deadlines in advance of our December 4, 2023, trial setting:

November 10, 2023: Deadline to serve Preliminary Witness and Exhibit Lists

November 15, 2023: Deadline to file Challenges to Expert Testimony

November 17, 2023: Deadline to file Proposed Jury Charges

November 22, 2023: Deadline to file Motions in Limine

November 27, 2023:

- o Deadline to file Final Witness and Exhibit Lists
- o Deadline to file Deposition Designations

November 29, 2023:

- o Deadline to file Responses to Challenges to Expert Testimony
- o Deadline to file Responses to Motions in Limine

December 1, 2023:

- o Deadline to file Objections to Witnesses and Exhibits listed on Final Witness and Exhibit Lists
- o Deadline to file Objections to Deposition Designations and Counter-Designations
- o Deadline to file Objections to Proposed Jury Instructions

We also propose that the Parties agree to exchange demonstratives to be used in Opening, Direct Examinations, or Closing by 7:30 p.m. the day prior to their use.

October 30, 2023

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If you are in agreement, please sign in the space below. If you would like to discuss the above proposal, please feel free to reach out at your convenience.

Sincerely,



Mitchell B. Bryant

AGREED:



Counsel for Plaintiff

MBB:mfv

Unofficial Copy Office of Marilyn Burgess District Clerk

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Yadir Rodriguez on behalf of Mitchell Bryant
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Envelope ID: 81164634
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Filing Description: Rule 11 Agreement
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