

**From:** Coms  
**Sent:** Wednesday, October 20, 2021 9:05 PM  
**To:** 6  
**Subject:** Fwd: Date for PMK Deposition WEC

Received your drafts at 9:01.

Phone won't let me open.

Attached, please see state of things re Friday with WEC. Sounds like a refusal to me.

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**From:** 3 <3@wispecialcounsel.org>  
**Sent:** Wednesday, October 20, 2021 5:33:17 PM  
**To:** johnsonkarp@doj.state.wi.us <johnsonkarp@doj.state.wi.us>  
**Cc:** 6 <6@wispecialcounsel.org>  
**Subject:** Re: Date for PMK Deposition WEC

Per our discussion today, the deponents scheduled for Friday Oct. 22 do not wish to agree to a continuance date, even if all objections are preserved and no rights or remedies are waived. Thus, deponents' counsel wishes to discuss the legal basis for such subpoena(s) and desire to discuss with Justice Gableman such legal bases at the earliest possible time, this evening or as soon as possible thereafter. Justice Gableman is requested to contact Mr. Karp at 608-440-1529.

Carol M.

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**From:** 3  
**Sent:** Tuesday, October 19, 2021 3:13 PM  
**To:** johnsonkarp@doj.state.wi.us <johnsonkarp@doj.state.wi.us>  
**Cc:** 6 <6@wispecialcounsel.org>  
**Subject:** Date for PMK Deposition WEC

Hello: confirming our conversation of today, we agree that we don't expect anyone to appear this Friday, Oct. 22, provided we have agreement on one of these days:

Nov. 15 0930  
Nov. 16 0930  
Nov. 17 0930

We can discuss any further scheduling issues at a later time, including the person who would be most able to address deposition topics.

Thank you,