

# **Exhibit 22**

**DeBord, Lisa M.N.**

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**From:** Angie Splittgerber <angie@randleslaw.com>  
**Sent:** Tuesday, August 22, 2017 2:05 PM  
**To:** Miller, Jan Paul; 'Bill Randles'; 'Bev'  
**Cc:** Cox, Daniel C.; DeBord, Lisa M.N.; Hohn, Christopher; Masson, Jeffrey A.; Blackwell, Elizabeth  
**Subject:** RE: Deposition subpoena -- Bader case

Hi Jan,

I'm a bit surprised to receive this with no effort to contact us and coordinate the date of the deposition. In my experience, counsel extend the courtesy of coordinating deposition dates before issuing notices and subpoenas. I understand that you and Bill have spoken and that this was an oversight and will not happen again. I am happy to coordinate any depositions with you.

That said, Ford Baldwin is an expert witness retained by Plaintiffs. All of his knowledge regarding this case has been developed in his role as an expert. It is improper to depose him this early, prior to expert disclosures, after which we will work with you to find a date that works for us and Ford.

Please put a stop to the subpoena.

Angie

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**From:** Miller, Jan Paul [<mailto:JMiller@thompsoncoburn.com>]  
**Sent:** Tuesday, August 22, 2017 1:43 PM  
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**Subject:** Deposition subpoena -- Bader case

Counsel,

Attached please find a notice of deposition and subpoena which is being served on Ford Baldwin. Please note that we will be deposing Dr. Baldwin as a fact witness at this deposition. Please let me know if you have any questions. Thanks.

Jan

**Jan Paul Miller**

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