

Bradley E. Heard

From: "Bradley E. Heard" <bheard@heardlawoffices.com>
To: "Stefan Ritter" <sritter@law.ga.gov>
Sent: Monday, February 12, 2007 3:47 PM
Subject: ACORN v. Cox; Wesley v. SEB

Stefan,

I believe we have some discovery that's due sometime this week in the ACORN v. Cox case. I'm wondering if we could get a 2-week extension on those until 2/28. I've been embroiled in some unanticipated litigation with an injunction hearing coming up. Plus, Brian's been out of town, and Elizabeth's on maternity leave. Please let me know if that would be a problem.

Also, on the DeKalb case, has Judge Hunter entered that dismissal order yet? I haven't seen it.

Finally, I'm in the process of transitioning back to my own solo practice, so please go back to using this address for future email correspondence. Thanks.

--

Bradley E. Heard, Esq.
The Heard Law Offices, LLC
3695-F Cascade Road, SW
Suite 1371
Atlanta, GA 30331-2105
Tel.: (404) 344-9255
Fax: (404) 344-7578
bheard@heardlawoffices.com
<http://www.heardlawoffices.com>

Bradley E. Heard

From: "Stefan Ritter" <sritter@law.ga.gov>
To: "Bradley E. Heard" <bheard@heardlawoffices.com>
Sent: Wednesday, February 14, 2007 4:12 PM
Subject: RE: ACORN v. Cox; Wesley v. SEB

Brad I have been out of the office for several days and so received your email this morning. I have tried to return your message by calling to the number below but there has been no answer (either the line is cut off on answer or I get a busy signal). Although I think the responses are past due, I will consent to an extension on the contingency that we are able to address all discovery scheduling issues, which I think and hope we easily can. Please call me immediately to discuss; I am out of the office again tomorrow so I'd like to discuss this today.

-- Stefan

-----Original Message-----

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Bradley E. Heard

From: "Stefan Ritter" <sritter@law.ga.gov>
To: <bheard@heardlawoffices.com>
Sent: Tuesday, February 27, 2007 3:32 PM
Attach: ATTORNEY_GENERAL-#429795-v1-ACORN__P__Motion_to_extend_discovery.DOC
Subject: ATTORNEY_GENERAL-#429795-v1-ACORN__P__Motion_to_extend_discovery.DOC

Brad:

Per our discussions please find attached a draft consent motion to extend discovery.

<<ATTORNEY_GENERAL-#429795-v1-ACORN__P__Motion_to_extend_discovery.DOC>>

Bradley E. Heard

From: "Bradley E. Heard" <bheard@heardlawoffices.com>
To: "Stefan Ritter" <sritter@law.ga.gov>
Sent: Tuesday, February 27, 2007 4:00 PM
Subject: Re: ATTORNEY_GENERAL-#429795-v1-ACORN__P__Motion_to_extend_discovery.DOC

Works for me, Stefan. And so that we're all on the same page, can we just say that Plaintiffs' responses to Defendants' discovery will be due by Monday, April 2, 2007? Brian Mellor just called me yesterday wondering when/whether he should get started on the ACORN stuff.

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From: [Stefan Ritter](#)
To: bheard@heardlawoffices.com
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Bradley E. Heard

From: "Stefan Ritter" <sritter@law.ga.gov>
To: "Bradley E. Heard" <bheard@heardlawoffices.com>
Sent: Tuesday, February 27, 2007 4:26 PM
Subject: RE: ATTORNEY_GENERAL-#429795-v1-ACORN__P__Motion_to_extend_discovery.DOC

Brad:

I plan to be out then for my kids' spring break from school and I wanted to review the documents then. I am willing to agree to give you until Wednesday March 27 if the judge extends discovery and if you will agree to have the documents and written responses all delivered to me by hand no later than then. Also, should I need a similar extension (which I hope not to, but one never knows), I hope we can agree you'll extend the same courtesy to me.

-- Stefan

From: Bradley E. Heard [<mailto:bheard@heardlawoffices.com>]
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From: "Bradley E. Heard" <bheard@heardlawoffices.com>
To: "Stefan Ritter" <sritter@law.ga.gov>
Sent: Tuesday, February 27, 2007 4:40 PM
Subject: Re: ATTORNEY_GENERAL-#429795-v1-ACORN__P__Motion_to_extend_discovery.DOC

All this time, and I never knew you had kids! :-)

The 27th is fine. Will make sure you have the written responses by then, along with the documents we're willing to produce (if they're not too voluminous). And of course I'm always willing to extend reasonable professional courtesies. Thanks.

Also, on a different note, you should have received our NOA in Wesely v. SEB. I still think it's worth it to see if the SOS/SEB will agree to resolve this case by agreeing to appropriate rules governing citizen rulemaking petitions. They're required to have them anyway, and right now, they don't. Getting those rules passed would certainly be easier than you and me briefing the issues in that case for the next 6 months. Let me know. Thanks.

Brad

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