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December 4, 2017

Matthew Shipman  
Attorney at Law  
P.O. Box 807  
Columbia City, IN 46725

Re: Kokomo Grace vs. EFAC

Dear Mr. Shipman:

Enclosed you will find discovery directed to Epworth Forest Administration Committee, Inc. Please note it is a combination of requests for admissions, interrogatories, and requests for production.

I also want to depose your client. I propose to utilize Trial Rule 30(B)(IV). I wanted to give you an early indication of this so that you might have an opportunity to determine a designated representative for deposition, and give that designated representative an opportunity to become "learned" with regard to the facts and issues at hand.

Would you please provide me with some dates that are available to you and your anticipated deponent? I suggest the appropriate time frame would be the weeks of February 12, February 19, or February 26.

As soon as you have provided me with available dates, I will prepare a Notice of Examination and we can proceed.

I would appreciate receiving those dates within the next two or three weeks so that we have sufficient lead time. If I have not heard back from you, I will go ahead and notice up the

deposition and we can sort it out later, as needed. In as much as this usually involves more work for the attorneys, I would appreciate having some dates so that we may avoid the hassle.

Thank you for your courtesies and we look forward to your deposition availability dates and discovery responses.

Very truly yours,

ROCKHILL PINNICK LLP



Richard K. Helm

RKH/evr

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