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May 26, 2015

Honorable L. Breland Hilburn PO Box 2114 Jackson, MS 39225

Re:

Cynthia N. Almond, et al v. Singing River Retirement System, et al

Cause No. 2014-2653

Dear Judge Hilburn:

Upon further reflection regarding your suggestion of a Special Master in this case, Mr. Barton and I would respectfully request that you appoint someone with whom you have worked, or someone who you know would take his or her role as directed and guided by the Court as instructed, and assist in expediting the discovery process in this very critical matter.

We would also like to point out that the Court ordered Defendant, Singing River Health System to produce the initial discovery documents within ten (10) days, and it was addressed and acknowledged by Ms. Duvall (May 13, 2015, Hearing Transcript page 31 attached herein), and as of the date of this letter, Counsel for Plaintiff has not received the first document from the Defendant, nearly two weeks after Your Honor ordered them to produce documents to counsel for Plaintiffs.

Sincerely,

DENHAM LAW FIRM, PLLC

EARL L. DENHAM

ELD/lrb Enclosures

cc:

Cynthia N. Almond All Counsel of Record 1 2

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out of 6 cases over there and I don't want to go running back in.

MR. REEVES: Just a point of clarification, I don't care about what was entered but all it says it invites everyone to participate if they want to. Nobody has to.

THE COURT: Well, in 10 days we are going to produce those documents to the Plaintiffs.

MS. DUVALL: Correct, Your Honor. We will produce within 10 days and we anticipate there may be further discovery.

THE COURT: And I think it would be a good idea for us to set a date for us to reconvene and for the Court to take up what additional issues would be generated by after you got a chance to review those documents and/or if for no other reason just have a meeting for a status report for the Court.

So I would like for us to have an agreed date for us to reconvene here before we leave today. I would say