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EXHIBIT 1

From: Harrison, Frank <FHarrison@williamskastner.com>
Sent: Saturday, September 23, 2023 10:10 AM
To: Ryan L. Munro <rmunro@lakemunrolaw.com>; Kevin T. Lake <klake@lakemunrolaw.com>
Cc: Barrett, Jenelle <JBarrett@williamskastner.com>; Aimee Warren <awarren@lakemunrolaw.com>
Subject: RE: Zwiener - depo info - updated RO to depo subpoena, confirmation of understanding of upcoming depositions

Ryan & Kevin, attached are revised designations/RO to the subpoena along with a redline showing changes from the last version I sent. This is almost entirely just swapping designated reps. More importantly, I want to memorialize our agreement for the depositions.

- Marti Bailey will be deposed as Milliman's rep on Monday (9/25) with the understanding that she was designated Tuesday (9/19) to avoid a wasted (if there is such a thing this time of year) trip to Seattle and to provide the basic, low-hanging HR/payroll information from the subpoena.

- Vicki Gleeson will be deposed as Milliman's rep on 10/5 in Dallas. She will be prepared to speak to (within the limits Milliman has spelled out in the attached RO) the balance of the topics and address any deeper detail questions that Marti may not have an answer to.

- JD Davis is still set to be deposed on 10/6 in Dallas. Please let me know ASAP if you intend to go forward with this. I need to book flights etc. myself and make sure JD is available. As you know, Milliman objects to having individuals deposed, at least before exhausting Milliman's knowledge and establishing some need for something beyond that. That objection stands, and we may have to discuss it, but for now I just want to do what I can to avoid confusion and confirm witness availability.

Feel free to correct anything I've misstated. I am working this weekend and can talk as needed.

Thanks,

Frank S. Harrison
Williams Kastner | Attorney at Law
601 Union Street, Suite 4100
Seattle, WA 98101-2380
P: 206-628-2789 | M: 813-850-9139
www.williamskastner.com | Bio | V-Card

WASHINGTON OREGON

From: Harrison, Frank
Sent: Tuesday, September 19, 2023 2:04 PM
To: rmunro@lakemunrolaw.com; klake@lakemunrolaw.com
Cc: Barrett, Jenelle <JBarrett@williamskastner.com>
Subject: RE: Zwiener - depo info - can do an HR person on Monday 9/25 and Vicki Gleeson on sale in Dallas on 10/5 after 10:30 local
Importance: High

Ryan and Kevin, let me know if those dates/times work and I will serve and updated RO shortly.

Frank S. Harrison
Williams Kastner | Attorney at Law
601 Union Street, Suite 4100
Seattle, WA 98101-2380
P: 206-628-2789 | M: 813-850-9139
www.williamskastner.com | Bio | V-Card

WASHINGTON OREGON

From: Harrison, Frank
Sent: Tuesday, September 19, 2023 11:10 AM
To: Harrison, Frank <FHarrison@williamskastner.com>; rmunro@lakemunrolaw.com; klake@lakemunrolaw.com
Cc: Barrett, Jenelle <JBarrett@williamskastner.com>
Subject: RE: Zwiener - documents produced

Guys, just spoke with my client contact and there are more documents related to these that apparently did not make it into their file upload. They are going to resend today. Will send when I have them.

Frank S. Harrison
Williams Kastner | Attorney at Law
601 Union Street, Suite 4100
Seattle, WA 98101-2380
P: 206-628-2789 | M: 813-850-9139
www.williamskastner.com | Bio | V-Card

WASHINGTON OREGON

From: LiquidFiles <transferadmin@williamskastner.com>
Sent: Tuesday, September 19, 2023 10:44 AM
To: rmunro@lakemunrolaw.com; klake@lakemunrolaw.com
Subject: Zwiener - documents produced

Subject to confidentiality order.

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Files attached to this message

Filename	Size	Checksum (SHA1)
File Request Re_ Subpoenas from Lake Munro - Michael Zwiener v. Mary Zipf-Zwiener - outstanding subpoenas_employees.zip	15.8 MB	d194ac687665cf4f4204224045c77df60eb0b6bba880d548ef1401cee1b75dca
H076 Zwiener Washington DC EB.pdf	17.8 MB	dcc9ca6fdbe2d4bd04552db8695cab3cbf881573d0fb31ced9aa31ddaf54ce7a
LOI - 01.24.2018 (1 of 2).pdf	222 KB	4d8313281a7995923c98e7487b092f3d4581f4b90716ab2cb1e0ba3ce080fd74
LOI - 01.24.2018 (2 of 2).pdf	229 KB	2a86f868f1992a9ba6f19e7172409307152f056b42ad6f5175b42140d4dde992
Zwiener - EP Participitation Acknowledgement - 06.26.2003.pdf	47.6 KB	6bf37e041e46dd753080e3553001b3e03294532cbb4e0271c13013af0bb6d135
G090 Zwiener St Louis EB.pdf	12.9 MB	a501fbe0bdffb9d7b0cdf826683f310696fecb1173ea1b89dc3e70c7572758a8
Zwiener EPCA Account .pdf	13 KB	b784af4de65c12a865918300b9a84398ca8a9cc5ec20d3f91938838 94134c82c

Please click on the following link to download the attachments:
https://transfer.williamskastner.com/message/NL2gD8vu6JvQeDLXAVH2uZ

The attachments are available until: **Tuesday, 17 October.**

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Williams Kastner
www.williamskastner.com

WASHINGTON OREGON

Ryan L. Munro
Attorney at Law
phone: (314) 863-0077
email: rmunro@lakemunrolaw.com
1650 Des Peres Rd, Ste., 220
St. Louis, MO 63131

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Ryan L. Munro
Attorney at Law
phone: (314) 863-0077
email: rmunro@lakemunrolaw.com
1650 Des Peres Rd, Ste., 220
St. Louis, MO 63131

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