Electronically Filed - ST LOUIS COUNTY - November 02, 2023 - 11:32 AM

EXHIBIT 2

From: Harrison, Frank
Sent: Monday, September 25, 2023 5:04 PM
To: Ryan L. Munro <rmunro@lakemunrolaw.com>; Kevin T. Lake <klake@lakemunrolaw.com>
Cc: Barrett, Jenelle <JBarrett@williamskastner.com>; Aimee Warren <awarren@lakemunrolaw.com>; Samantha Hamann <SHamann@lakemunrolaw.com>
Subject: RE: Zwiener - depo info - updated RO to depo subpoena, confirmation of understanding of upcoming depositions

Kevin & Ryan, just to confirm: I am still working to nail down specific with Vicki Gleeson for 10/5 but should have tomorrow. Can you please confirm that is the next depo and you are not attempting to proceed with Dermot (or any other Milliman current or former employees/EPS) besides JD the day after Vicki Gleeson?

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From: Harrison, Frank
Sent: Monday, September 25, 2023 10:12 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>; Samantha Hamann <SHamann@lakemunrolaw.com>
Subject: RE: Zwiener - depo info - updated RO to depo subpoena, confirmation of understanding of upcoming depositions

She has a doctor appointment at 2 PM and it is a 1.5 hour drive from where she is coming from, so 4 PM will not work. She leaves for Italy 10/6. Is it possible to do the morning?

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From: Harrison, Frank <FHarrison@williamskastner.com>
Sent: Monday, September 25, 2023 8:08 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>; Samantha Hamann <SHamann@lakemunrolaw.com>
Subject: Re: Zwiener - depo info - updated RO to depo subpoena, confirmation of understanding of upcoming depositions

I can check but I expect some pushback without a hard stop time. How is 10/4?

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From: Ryan L. Munro <rmunro@lakemunrolaw.com>
Sent: Monday, September 25, 2023 7:10 AM
To: Harrison, Frank <FHarrison@williamskastner.com>; Kevin T. Lake <klake@lakemunrolaw.com>
Cc: Barrett, Jenelle <JBarrett@williamskastner.com>; Aimee Warren <awarren@lakemunrolaw.com>; Samantha Hamann <SHamann@lakemunrolaw.com>
Subject: RE: Zwiener - depo info - updated RO to depo subpoena, confirmation of understanding of upcoming depositions

Frank,

I know Sam just sent you an email about October 5, 2023 and Vicki Gleeson's deposition. We will need to start that around 4:00pm can you please confirm that this will work? It should not be a terribly long deposition but may go past 5:00pm. If that is acceptable we will book the court reporters.
Regarding Mr. Davis, unfortunately with a lot of this happening contemporaneously, I still intend to move forward with that.

Kind Regards,
Ryan L. Munro, Attorney at Law

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