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

EXHIBIT 4

From: "Ryan L. Munro" <rmunro@lakemunrolaw.com>
Date: 10/2/23 5:36 PM (GMT-05:00)
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>, "Stobie, Laura" <lstobie@mlklaw.com>
Subject: RE: Zwiener - depo info - updated RO to depo subpoena, confirmation of understanding of upcoming depositions

Frank,
I cannot control Mr. Davis' mindset at deposition.

Kind Regards,
Ryan L. Munro, Attorney at Law

Direct: (314) 806-2602
Main: (314) 863-0077
email: RMunro@LakeMunroLaw.com

St. Louis County:
1650 Des Peres Rd., Ste. 220, St. Louis, MO 63131

St. Charles County:
6 Westbury Dr., St. Charles, MO 63301

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From: Harrison, Frank <FHarrison@williamskastner.com>
Sent: Monday, October 2, 2023 9:25 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>; Stobie, Laura <lstobie@mlklaw.com>
Subject: RE: Zwiener - depo info - updated RO to depo subpoena, confirmation of understanding of upcoming depositions

Really?? Is there a fee I need to know about for moving a depo location? We are working to accommodate you including starting a depo at 4 PM the day before. Please reconsider. You're going to have an annoyed witness if you don't.

Frank S. Harrison
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From: Ryan L. Munro <rmunro@lakemunrolaw.com>
Sent: Monday, October 2, 2023 10:20 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>; Stobie, Laura <lstobie@mlklaw.com>
Subject: RE: Zwiener - depo info - updated RO to depo subpoena, confirmation of understanding of upcoming depositions

Frank,
At this point all arrangements have been made and booked according to addresses. We cannot move the depo for JD at this time.

Kind Regards,
Ryan L. Munro, Attorney at Law

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From: Harrison, Frank <FHarrison@williamskastner.com>
Sent: Monday, October 2, 2023 9:17 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>; Stobie, Laura <lstobie@mlklaw.com>
Subject: RE: Zwiener - depo info - updated RO to depo subpoena, confirmation of understanding of upcoming depositions

All, JD Davis is also north of Texas a ways. He is asking whether the depo can be closer to him. I need to get more details, but would you all be open to doing his depo at the same spot as Vicki's the evening before?

Frank S. Harrison
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From: Harrison, Frank
Sent: Tuesday, September 26, 2023 10:43 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

Vicki Gleeson can be deposed 10/5 at 4 PM in McKinney, TX. This is north of Dallas and on her way from the doctor appointment home. Please confirm that works.

Frank S. Harrison
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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?