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EXHIBIT 6

Stobie, Laura

From: Stobie, Laura
Sent: Tuesday, October 3, 2023 4:43 PM
To: 'Ryan L. Munro'; Harrison, Frank
Cc: Barrett, Jenelle; Aimee Warren; Samantha Hamann; Kevin T. Lake
Subject: RE: Zwiener - no deposition of Milliman Thursday

Why don't we work to find a new date/ time that works for Ms. Gleason or whomever is designated for the company if it is even needed after we see their written declaration? It sounds like this was set on a bad day for her, she was working to accommodate it and it became too much with her personal commitments.

Laura Stobie, Esq.
McCarthy, Leonard & Kaemmerer, L.C.
825 Maryville Centre Drive, Suite 300
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314-392-5200 office
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From: Ryan L. Munro <rmunro@lakemunrolaw.com>
Sent: Tuesday, October 3, 2023 4:24 PM
To: Harrison, Frank <FHarrison@williamskastner.com>
Cc: Barrett, Jenelle <JBarrett@williamskastner.com>; Aimee Warren <awarren@lakemunrolaw.com>; Samantha Hamann <SHamann@lakemunrolaw.com>; Stobie, Laura <lstobie@mlklaw.com>; Kevin T. Lake <klake@lakemunrolaw.com>
Subject: RE: Zwiener - no deposition of Milliman Thursday

Frank,

With all due apologies and condolences for your family's loss, your initial email said she "kept" her son. We did determine that the space is open for Friday but without both parties agreeing to appear, we will not change our current plans. I will give you until tomorrow at noon CST to make the decision regarding Ms. Gleeson. If we receive a response that she has stopped refusing to appear for her deposition, then we will agree to change the location of Mr. Davis' deposition. If we do not receive such a response, then we will hold the depositions as follows:

1. Deponent: **Vicki Gleeson beginning on 10/5/2023 at 4:00pm CST at 205 W Louisiana Street, Suite 203, McKinney, TX 75069**; and
2. Deponent: **J.D. Davis beginning on 10/6/2023 at 9:00am CST at Veritext, 600 N Pearl Street, Ste 2230, Dallas, TX 75201**.

We will take a non-appearance deposition regarding Vicki Gleeson at 4:15pm if she does not appear.

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: Tuesday, October 3, 2023 3:57 PM
To: Ryan L. Munro <rmunro@lakemunrolaw.com>
Cc: Barrett, Jenelle <JBarrett@williamskastner.com>; Aimee Warren <awarren@lakemunrolaw.com>; Samantha Hamann <SHamann@lakemunrolaw.com>; Stobie, Laura <lstobie@mlklaw.com>; Kevin T. Lake <klake@lakemunrolaw.com>
Subject: RE: Zwiener - no deposition of Milliman Thursday

Ryan, sorry for just responding, I have been tied up all day. I disagree with everything you've stated below, but I don't think I can state anything clearer than I did earlier today. Please send me any emails you sent me between my email last night (which had a typo but should've referenced the 19 year old cousin my Aunt just lost (*i.e.*, passed away)) and my e-mail of this morning.

Please let me know if you will agree to move JD Davis to Thursday or not. Milliman will **not** be appearing Thursday.

I am available to discuss tomorrow from 4 PM EST onward.

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: Ryan L. Munro <rmunro@lakemunrolaw.com>
Sent: Tuesday, October 3, 2023 1:03 PM
To: Harrison, Frank <FHarrison@williamskastner.com>

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Cc: Barrett, Jenelle <JBarrett@williamskastner.com>; Aimee Warren <awarren@lakemunrolaw.com>; Samantha Hamann <SHamann@lakemunrolaw.com>; Stobie, Laura <lstobie@mlklaw.com>; Kevin T. Lake <klake@lakemunrolaw.com>
Subject: RE: Zwiener - no deposition of Milliman Thursday

Frank,

The purpose of this email is to correct some of the inaccuracies in your below correspondence, to state our position on your below correspondence, and to make a good faith effort to resolve this discovery dispute under Local Rule 33.5.

Regarding the myriad inaccuracies in your below email, first and foremost is your statement that "We never heard back from you." I am not sure how you square that with the attached, but you clearly did hear back from us, and you demanded, based on dinner reservations, to speak today without giving a time that you are available. Further you continued to demand that we either "agree to move Friday['s deposition] or Thursday['s deposition] is off." To be clear, the deposition of JD Davis is subject to a Missouri Subpoena Duces Tecum, which operates as an order of law, which by your acceptance, subjected your client to the jurisdiction of Missouri and the order to appear. We do not agree to waive his appearance. It is neither a request, nor a demand, nor a negotiation. The subpoenas are a court order that you accepted, negotiated to an agreement, and we have planned around for weeks now. In fact you failed to provide a deponent in Seattle (Mr. Dermot), based on your representation and our agreement to produce the person who would know the information we needed (Ms. Gleeson), in Texas on Thursday. Further, it will be contrary to our most recent meeting of minds as to where, when, and the scope of the deposition would take place. I have also attached the correspondence suggesting that we take the depo closer to Mr. Davis' home on 9/14 and your subsequent response that "It's TX". We just determined that the facilities we are using on Thursday are available Friday; regardless, based on the tone and tenor of your communications, we are not inclined to acquiesce to your requests to make any further changes to the depositions, Ms. Gleeson's or Mr. Davis'.

If either of your clients chose not to appear, it will not be subject to any valid objections raised to the court and will not be by our agreement. This email is notice that we reject your most recent demands for negotiations regarding the depositions and will hold them as follows:

1. Deponent: Vicki Gleeson beginning on 10/5/2023 at 4:00pm CST at 205 W Louisiana Street, Suite 203, McKinney, TX 75069; and
2. Deponent: J.D. Davis beginning on 10/6/2023 at 9:00am CST at Veritext, 600 N Pearl Street, Ste 2230, Dallas, TX 75201.

While we would be happy to move Depo #2 to the same facility as Depo #1, this will only be agreed to subject to you changing your tone and taking a more professional approach. As of sending this email, we are not in agreement to any changes from the above unless further stated in writing. This email and it's contents and attachments is our good faith effort to resolve the disputed discovery issues under Local Rul 33.5.

Kind Regards,

Ryan L. Munro, Attorney at Law

Lake Munro
Attorneys 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

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From: Kevin T. Lake <klake@lakemunrolaw.com>
Sent: Tuesday, October 3, 2023 11:03 AM
To: Harrison, Frank <FHarrison@williamskastner.com>
Cc: Ryan L. Munro <rmunro@lakemunrolaw.com>
Subject: RE: Zwiener - no deposition of Milliman Thursday

Mr. Harrison:

Will you be available to speak around 11:30 AM CST?

From: Harrison, Frank <FHarrison@williamskastner.com>
Sent: Tuesday, October 3, 2023 9:50 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 - no deposition of Milliman Thursday
Importance: High

Ryan and Kevin,

We never heard back from you. Milliman will not be appearing for a deposition this Thursday. Milliman cannot be prepared for Thursday on the EPCA documentation that has been requested. We are still working to produce that documentation. After three plus hours of preparation yesterday with Ms. Gleeson, Milliman will need to switch designees, most likely to someone in finance out of Seattle. I am going to send you possible dates in the interest of scheduling, while maintaining an objection to that deposition going forward at all.

Further, having now spent considerable time reviewing the details, Milliman objects to the need for any deposition of Milliman (or anyone else employed there), in person or virtual, given what is at issue in this divorce case. At most, the basic points you've told me you need – what Mr. Zwiener has in his accounts, when it will come out, etc. – can be addressed via a declaration or, at most, a written deposition. The math behind those amounts is irrelevant. You have already deposed one employee of Milliman and one corporate representative. The remaining topics are unduly burdensome to prepare a witness to testify to. Instead, Milliman will providing a declaration with those basics this week; if you have specific questions you would like addressed, please let me know in advance. Milliman is not opposed to providing reasonable, relevant information, but this divorce case should not be an annuity, or travel opportunity on a client's dime, for the attorneys involved.

Given the amount of preparation and resources this is requiring of Milliman, Milliman objects to JD Davis – or anyone else at Milliman being deposed. However, JD Davis, in his individual capacity, can be available for a deposition Thursday at 4 PM or, alternatively, as early as possible Friday AM. To the extent you insist on proceeding with JD Davis, there is no reason Thursday at 4 PM cannot work given Ms. Gleeson will not be appearing then.

Please confirm receipt. Thank you.