

Scott Cole

Subject: FW: AFL v. Sterlite, C.A. No. 23-1202-RGA - Subpoena to Sterlite Technologies, Inc.

From: W. Taylor Stanley <Taylor.Stanley@arlaw.com>

Sent: Tuesday, July 30, 2024 8:40 AM

To: Scott Cole <scole@dority-manning.com>; Farnan, Kelly E. <Farnan@RLF.com>

Cc: aconnolly@connollygallagher.com; Raymond R. Ferrera <Ray.Ferrera@arlaw.com>; Lyndey R. Z. Bryant <lyndey.bryant@arlaw.com>; Tim Williams <timw@dority-manning.com>

Subject: RE: AFL v. Sterlite, C.A. No. 23-1202-RGA - Subpoena to Sterlite Technologies, Inc.

Scott,

The individuals in the ESI disclosure from STHI are STI-SC employees. I am unable to see your concern at this time given STHI's counsel's email and will oppose any motion to compel on all grounds previously stated, and on the basis that this information is more easily obtained from a party.

At this point I suggest you withdraw the subpoena to STI-SC, without prejudice. You can then obtain the STHI documents and review them. If, after that review, you believe you need to subpoena STI-SC, I will accept service.

Please give me a call at your convenience today to discuss.

Taylor