

From: [Chaney, Tanya \(SHB\)](#)
To: [Mann, Rex](#); [Dale, Ahtoosa Amini](#); [Block, Courtney](#); [Boyce, Tyler](#); [Sosolik, Emily R. \(SHB\)](#); [Ripkowski, Deborah \(SHB\)](#); [Morehan, David W. \(SHB\)](#); [Reckers, Rob \(SHB\)](#)
Cc: [USWS-Liberty](#)
Subject: RE: USWS v. Liberty (SDTX) - Email Production and Schedule
Date: Monday, May 5, 2025 2:44:01 PM
Attachments: [image002.jpg](#)
[image004.jpg](#)

Rex,

Just following up on this, is there a time tomorrow afternoon before 3:00 when you are available to talk about the schedule? To let you know what we're thinking, we believe there's enough play in the current schedule to move all deadlines through and including the dispositive motion/Daubert deadline back one month, without moving the trial date. We propose doing that now, while we wait to see how long it takes to get a claim construction order. Depending on the timing of the claim construction order, a longer extension may ultimately be necessary.

Let us know if Plaintiffs would agree to a one-month extension of all deadlines through and including the dispositive motion/Daubert deadline (currently October 16). We're available tomorrow afternoon to discuss this if you like.

Best regards,

Tanya Chaney

From: Chaney, Tanya (SHB)
Sent: Friday, May 2, 2025 4:17 PM
To: Mann, Rex <RMann@winston.com>; Dale, Ahtoosa Amini <ADale@winston.com>; Block, Courtney <CBlock@winston.com>; Boyce, Tyler <tboyce@winston.com>; Sosolik, Emily R. (SHB) <esosolik@shb.com>; Ripkowski, Deborah (SHB) <DRipkowski@shb.com>; Morehan, David W. (SHB) <DMOREHAN@shb.com>; Reckers, Rob (SHB) <RRECKERS@shb.com>
Cc: USWS-Liberty <USWS-Liberty@winston.com>
Subject: RE: USWS v. Liberty (SDTX) - Email Production and Schedule

Hi Rex,

Tuesday afternoon sounds good. We're available anytime before 3:00. What time would be good for you?

Tanya Chaney

From: Mann, Rex <RMann@winston.com>
Sent: Friday, May 2, 2025 4:09 PM
To: Chaney, Tanya (SHB) <tchaney@shb.com>; Dale, Ahtoosa Amini <ADale@winston.com>; Block, Courtney <CBlock@winston.com>; Boyce, Tyler <tboyce@winston.com>; Sosolik, Emily R. (SHB)

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Cc: USWS-Liberty <USWS-Liberty@winston.com>

Subject: RE: USWS v. Liberty (SDTX) - Email Production and Schedule

EXTERNAL

Hi Tanya,

We'll get back to you on the other issues. As to the schedule, we are fine with it as is, but we are also always happy to work with the other side to do something that works for everyone when it comes to scheduling issues. How is Tuesday afternoon? If you have any thoughts on what you would like to do on the schedule, let us know beforehand if you can so we can think about it and talk to our client.

Regards,

Rex

Rex Mann

Partner

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From: Chaney, Tanya (SHB) <tchaney@shb.com>

Sent: Friday, May 2, 2025 3:58 PM

To: Dale, Ahtoosa Amini <ADale@winston.com>; Block, Courtney <CBlock@winston.com>; Boyce, Tyler <tboyce@winston.com>; Sosolik, Emily R. (SHB) <esosolik@shb.com>; Ripkowski, Deborah (SHB) <DRipkowski@shb.com>; Morehan, David W. (SHB) <DMOREHAN@shb.com>; Reckers, Rob (SHB) <RRECKERS@shb.com>

Cc: USWS-Liberty <USWS-Liberty@winston.com>

Subject: USWS v. Liberty (SDTX) - Email Production and Schedule

Counsel,

We wanted to touch base about a few issues. First, the initial batch of our rolling production of emails is going to be delayed until early next week. Our firm is closed today for an all-attorney meeting. We knew about that last week, of course, but it has also turned out that key members of our litigation support team have been unavailable yesterday and today. Without them, we have been unable to finalize our initial production set to get it served today. It is a top priority once they return.

In the meantime, we were wondering if you had a chance to run the revised search terms we sent, to determine whether they were returning a more manageable number of hits. Please let us know if they need additional narrowing.

Also, we think it makes sense to talk about the schedule. It seems likely that we won't have a final claim construction order for several weeks or more, considering that once we get a Report & Recommendation from Judge Bryan, one side or the other (or both) will probably have objections that will need to be ruled on before the order is final. Is there a time next week that you would be available to talk about possibly extending other case deadlines to accommodate the timing of the claim construction order?

Thank you very much.

Tanya L. Chaney

Senior Counsel

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