



Bradley Steele
& Pierce, LLP
Attorneys At Law

January 5, 2016

Mr. Brent Coon
Coon & Associates,
Attorneys at Law
215 Orleans Street
Beaumont, TX 77701

Via E-Mail: Brent@bcoonlaw.com

RE: Cause No. E-197,368 – *Henderson v. JCAD*

Dear Brent:

I have reviewed all our prior communications with regard to the Henderson matter. We have provided you everything we have that is responsive to the various requests you and Bailey have made to the District. Our agreement was to provide information requested by you in an informal fashion, which we have done. Although we did have a discussion about scheduling depositions of our respective clients, there was never any discussion about the timing of a deposition and the timing of the hearing on our plea to the jurisdiction.

I do not think that we have, in any way, done anything contrary to our agreement. I also think that procedurally we are correct in wanting to have the plea heard prior to the deposition. No matter how much you and Bailey continue to try and put a conspiracy spin on this or run to the media about how we are trying to avoid a deposition, in your words....it just ain't so.

All that being said, let's get the depositions scheduled and get them out of the way and then we can fight the procedural issues we have raised in the plea to the jurisdiction. JCAD has nothing to hide and we believe legally we are correct on the law. Angie Bellard is available to give her deposition January 28th, starting at 9:00 a.m. in my office. I hope that date works for you. If it does not, please let me know and I will get alternative dates. If that date is good, let me know and also please get me dates for Elaine Henderson's deposition either the following day or the following week. We can work on resetting the hearing on the Plea to the Jurisdiction for mid February.

Let me know on the above dates so we can schedule them, avoid the hearing Thursday, and move this case along.

Sincerely,

Lance P. Bradley

LPB/gh