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LITIGATION ASSISTANT  
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November 2, 2021

The Honorable Michael Gableman  
Special Counsel  
Wisconsin State Assembly Committee on Elections and Campaigns  
200 South Executive Drive, Suite 101  
Brookfield, WI 53005

Dear Special Counsel Gableman:

I am writing with regard to the return date of the deposition subpoena which your office issued for the person most knowledgeable in regard to the 2020 General Election that is employed by the City of Madison. The subpoena originally scheduled the deposition for October 22, 2021. On October 21, 2021, I received your email correspondence continuing the return date to November 15, 2021. Your email, as well as my previous telephone conversation with Carol of your office, indicated that the continuance date would give both parties additional time to reach an understanding of the scope and nature of the topics to be addressed in the deposition.

The requested continuance date is two weeks away and separate court action has been initiated since we received your correspondence. That may or may not affect the enforcement of a similar subpoena in your proceedings as well as the format of any deposition. As you know, the Court is not scheduled to rule in that matter until later in December at the earliest, and that litigation is likely to also govern the issues we have raised regarding our subpoena.

Under these circumstances, and because we have received no further request from you, I am reiterating our understanding that no official from the City of Madison is required to appear on November 15, 2021 unless we are provided with a more specific scope of inquiry and reach an agreement on other details such as the format and length

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of any deposition. Please contact me if you have any questions regarding this correspondence.

Sincerely,

A handwritten signature in cursive script that reads "Michael Haas".

Michael Haas  
City Attorney

cc: Mayor Satya Rhodes-Conway  
City Clerk Maribeth Witzel-Behl