

Healy Gallagher, Erin (TAX)

From: "Healy Gallagher, Erin (TAX)"
Sent: Monday, July 03, 2017 2:51 PM
To: Law Office of John R Teakell
Cc: Hines, Erin R. (TAX); Moran, Christopher R. (TAX)
Subject: RE: Howell deposition

I never received the message. Please let me know what your questions are and I'll get back to you as soon as possible.

Erin Healy Gallagher
Department of Justice - Tax Division
PO Box 7238
Washington DC 20044
(o) 202 353 2452
(f) 202 514 6770
erin.healygallagher@usdoj.gov

From: Law Office of John R Teakell [mailto:jteakell@teakelllaw.com]
Sent: Monday, July 03, 2017 2:48 PM
To: Healy Gallagher, Erin (TAX) <Erin.HealyGallagher@tax.USDOJ.gov>
Cc: Hines, Erin R. (TAX) <Erin.R.Hines@tax.USDOJ.gov>; Moran, Christopher R. (TAX) <Christopher.R.Moran@tax.USDOJ.gov>
Subject: Re: Howell deposition

Ms. Gallagher,

I left a message for you in the recent past, but have not heard from you. Within the message were clarifying questions for you about the deposition. Please respond, and I will re-send the message if need be. Thank you,

John Teakell
Law Office of John R. Teakell
2911 Turtle Creek Blvd.
Suite 300
Dallas, TX 75219
Tele. (214) 523-9076
Fax (214) 523-9077

On Jul 3, 2017, at 11:04 AM, Healy Gallagher, Erin (TAX) wrote:

Mr. Teakell,

I have not heard back from you in response to my emails below. I am checking with counsel for the defendants in the underlying litigation about August 23. If that date works for them, **I plan to file the attached by noon Eastern on July 6.** If I do not hear back from you before then, I will remove your name from the signature blocks and change the style of the status report accordingly.

Thank you,



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From: "Healy Gallagher, Erin (TAX)"
Sent: Wednesday, June 28, 2017 11:53 PM
To: John Teakell <jteakell@teakelllaw.com>
Cc: Hines, Erin R. (TAX) <Erin.R.Hines@tax.USDOJ.gov>; Moran, Christopher R. (TAX) <Christopher.R.Moran@tax.USDOJ.gov>
Subject: RE: Howell deposition

Mr. Teakell,

I have not heard back from you from my June 21 email below. I need to coordinate with opposing counsel in Utah before you and I submit a date to the court. Please let me know by noon on Friday whether August 23 will work for Mr. Howell to be deposed at the US Attorney's Office in Dallas. Thank you.

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From: "Healy Gallagher, Erin (TAX)"
Sent: Wednesday, June 21, 2017 7:50 AM
To: John Teakell <jteakell@teakelllaw.com>
Cc: Hines, Erin R. (TAX) <Erin.R.Hines@tax.USDOJ.gov>; Moran, Christopher R. (TAX) <Christopher.R.Moran@tax.USDOJ.gov>
Subject: RE: Howell deposition

John,

The D. Utah granted our motion to take discovery, including Mr. Howell's deposition, out of time.

My proposal for Mr. Howell's deposition is this: I can combine his deposition with another trip I have to Texas if we set it for Wednesday, August 23, in the Dallas U.S. Attorney's Office. This is outside Judge Ray's 60-day window, but if it works for both of us, it seemed like he would be fine with that. If we can agree on this, I'll run it past opposing counsel in Utah.

Please let me know your response by Friday, if possible.

Thank you,

Erin Healy Gallagher

From: Healy Gallagher, Erin (TAX)
Sent: Thursday, June 08, 2017 2:51 PM
To: 'John Teakell' <jteakell@teakelllaw.com>
Subject: Howell deposition

Hi again John,

I'll be out of the office next week. I'll get back to you after June 19 with any update on the motion to take discovery out of time pending in Utah.

And if Mr. Howell is willing to come to Dallas, that would be great. Please let me know about that.

Thanks,

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<2017 07 03 proposed order re motion to compel Howell
deposition.DOCX><2017 07 03 status report re motion to compel Howell
deposition.DOCX>