

From: Greenberg, Douglas Douglas.Greenberg [REDACTED]  
Subject: Fw: Fwd: Deposition of Peter Ness  
Date: May 11, 2011 at 10:47 AM  
To: douglasgreenberg [REDACTED]



[REDACTED]

[REDACTED]

From: Brett Engel <brett@gre-law.com>  
Date: May 11, 2011 9:02:42 AM PDT  
To: Patricia Carpenter <pac@pacarpenter.com>  
Subject: Deposition of Peter Ness

Dear Pat:

I am sending you a list of documents I would like to go out with the subpoena for Peter Ness. I am also sending you a draft list of questions for the deposition. Both documents are sent in two different formats. Also, I'm sending a recent letter from the opposing attorney asking that I agree to "parameters" for the deposition. I wrote back and declined.

If you wish to send me your retainer agreement, please do so. I can then get you your money.

The commission is good for 28 days. Would you like to coordinate a date for the deposition?

Brett Engel

[REDACTED]

Anne S. Ness Revocable Trust dated April 26, 1972, with any Amendments and Restatements.

Documents evidencing any payments to Hannah Williams pursuant to the Anne S. Ness Revocable Trust.

Documents evidencing any payments to Daniel Williams pursuant to the Anne S. Ness Revocable Trust.

Documents evidencing any funds payable to or for the benefit of Daniel Williams during the past five years.

Documents evidencing any funds payable to or for the benefit of Hannah Williams during the past five years.

Copies of any check you have written, individually or as Trustee, to Hannah Williams, Daniel Williams, or Alexander Williams.

Documents regarding any trust you have established for Hannah Williams or Daniel Williams.

Documents regarding any college savings account you have established for Hannah Williams or Daniel Williams.

Any correspondence between you and Alexander Williams and/or Traci Greenberg regarding the Anne S. Ness Revocable Trust.



Peter Ness  
Questions.pdf



Subpoena list  
Peter Ness



Peter Ness  
Questions



2011\_05\_10\_16\_4  
3\_03.pdf

Brett Engel  
Gearing Rackner Engel & McGrath  
121 SW Morrison St., Suite 750  
Portland, Oregon 97204  
503-222-9116  
(f) 503-222-9118  
brett@gre-law.com

The information contained in this email is intended only for the personal and confidential use of the recipient(s) named above. If you are not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly forbidden. If you have received this message in error, please notify us immediately by reply email and delete the original message.

---

If you are not the intended recipient, please contact the sender by reply email and delete all copies of the original message.

---

Because email can be altered electronically, the accuracy of this message cannot be guaranteed.

Brett Engel  
Gearing Rackner Engel & McGrath  
121 SW Morrison St., Suite 750  
Portland, Oregon 97204  
503-222-9116  
(f) 503-222-9118  
brett@gre-law.com

The information contained in this email is intended only for the personal and confidential use of the recipient(s) named above. If you are not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly forbidden. If you have received this message in error, please notify us immediately by reply email and delete the original message.

---

If you are not the intended recipient, please contact the sender by reply email and delete all copies of the original message.

---

Because email can be altered electronically, the accuracy of this message cannot be guaranteed.

