

EXHIBIT D

From: [Shannon Huff](#)
To: [Shannon Huff](#)
Subject: RE: Gallery - LeBlanc Extension Request
Date: Thursday, March 24, 2022 8:25:36 AM

-----Original Message-----

From: Amy M. Wilkens
Sent: Friday, February 18, 2022 12:05 PM
To: PManship@burgsimpson.com
Cc: lfink@springelfink.com; David S. Schopick; Cole Crabtree; aah@jaburgwilk.com; Michael A. Ludwig; sbest@jshfirm.com; Thomas J. Shorall; Jason J Boblick; shannon.huff@raibarone.com; Mohamad.Tokko@raibarone.com; PhoenixLocal@libertymutual.com; JHarmon@burgsimpson.com; S
Subject: RE: Gallery - LeBlanc Extension Request

Thanks all. Apologies as we had some unforeseen delays. My office is sending out a supplemental disclosure with Bert Howe's report, repair estimate and allocation which I anticipate Monday. Please see the attached proposed stipulation re amending the scheduling order for this matter. The proposed dates are intended to address the additional expert discovery which has occurred and recent mediation efforts. Please advise if you are agreeable to the attached or have alternative dates to suggest.

Amy

Amy Wilkens | Partner | Lorber, Greenfield & Polito, LLP www.lorberlaw.com
Arizona | Direct: 602-385-4446 | Main: 602-437-4177 | 3930 E. Ray Road, Ste. 260, Phoenix, AZ 85044
New Mexico | Main: 800-291-3062 | 820 Second Street NW, Albuquerque, NM 87102
Arizona | California | Colorado | Nevada | New Mexico | Oregon | Washington

COVID-19 EMERGENCY EMAIL CONTACT – emergencycontacts@lorberlaw.com

From: Penny J. Manship <PManship@burgsimpson.com>
Sent: Monday, February 14, 2022 4:45 PM
To: Amy M. Wilkens <AWilkens@lorberlaw.com>
Cc: Stephen Best <SBest@jshfirm.com>; twales@welshlawgroup.com; lfink@springelfink.com; dschopick@springelfink.com; ccc@jaburgwilk.com; aah@jaburgwilk.com; mludwig@jshfirm.com; sbest@jshfirm.com; tomshorall@smbattorneys.com; jasonboblick@smbattorneys.com; Shannon.Huff@raibarone.com; Mohamad.Tokko@raibarone.com; PhoenixLocal@libertymutual.com; Jessica Harmon <JHarmon@burgsimpson.com>; Grace McGregor

Osberg <gosberg@burgsimpson.com>; admin@wb-law.com; Diana Weeks <Dweeks@jshfirm.com>; Sabine Asser King <SAsserKing@jshfirm.com>; barbaras@wb-law.com; diw@wb-law.com

Subject: RE: Gallery - LeBlanc Extension Request

Amy,

Following up on the status of circulating new deadlines. I do not recall seeing anything yet.

Penny J. Manship

BURGSIMPSON

Telephone: (888) 895-2080

Cell Phone: (818) 395-3999

From: Penny J. Manship

Sent: Friday, February 4, 2022 4:30 PM

To: Amy M. Wilkens <AWilkens@lorberlaw.com>

Cc: Stephen Best <SBest@jshfirm.com>; twales@welshlawgroup.com; lfink@springelfink.com; dschopick@springelfink.com; ccc@jaburgwilk.com; aah@jaburgwilk.com; mludwig@jshfirm.com; sbest@jshfirm.com; tomshorall@smbattorneys.com; jasonboblick@smbattorneys.com; Shannon.Huff@raibarone.com; Mohamad.Tokko@raibarone.com; PhoenixLocal@libertymutual.com; Jessica Harmon <JHarmon@burgsimpson.com>; Grace McGregor Osberg <gosberg@burgsimpson.com>; admin@wb-law.com; Diana Weeks <Dweeks@jshfirm.com>; Sabine Asser King <SAsserKing@jshfirm.com>; barbaras@wb-law.com; diw@wb-law.com

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Plaintiff is in agreement for short extensions, including with respect to lay witness disclosures which would otherwise be due today.

Penny J. Manship

On Feb 4, 2022, at 4:25 PM, Amy M. Wilkens <AWilkens@lorberlaw.com> wrote:

?

Following up with below, I'm hoping we'll have new dates circulated early next week. It looks like our current schedule has lay witness disclosure today and it's my intention that deadline would be extended briefly along with the others. Let me know if this presents a problem for anyone. Otherwise, I'll be in touch first thing next week.

Thanks,

Amy

Amy Wilkens | Partner | Lorber, Greenfield & Polito, LLP www.lorberlaw.com

Arizona | Direct: 602-385-4446 | Main: 602-437-4177 | 3930 E. Ray Road, Ste. 260,
Phoenix, AZ 85044

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Arizona | California | Colorado | Nevada | New Mexico | Oregon | Washington

COVID-19 EMERGENCY EMAIL CONTACT –
emergencycontacts@lorberlaw.com

From: Amy M. Wilkens

Sent: Friday, January 21, 2022 1:45 PM

To: Stephen Best <SBest@JSHFIRM.COM>; Penny J. Manship <PManship@burgsimpson.com>; twales@welshlawgroup.com; lfink@springelfink.com; dschopick@springelfink.com; ccc@jaburgwilk.com; aah@jaburgwilk.com; mludwig@jshfirm.com; sbest@jshfirm.com; tomshorall@smbattorneys.com; jasonboblick@smbattorneys.com; Shannon.Huff@raibarone.com; Mohamad.Tokko@raibarone.com; PhoenixLocal@LibertyMutual.com

Cc: Jessica Harmon (JHarmon@burgsimpson.com) <JHarmon@burgsimpson.com>; Grace McGregor Osberg <gosberg@burgsimpson.com>; admin@wb-law.com; Diana Weeks <Dweeks@JSHFIRM.com>; Sabine Asser King <SAsserKing@JSHFIRM.COM>; barbaras@wb-law.com; diw@wb-law.com

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All-

I'm copying everyone on this email, as Penny and I are discussing a brief extension to the deadlines in this matter to accommodate some expert and other discovery which has occurred, as well as efforts related to the recent mediation. We will circulate new dates shortly and that will include an extension of the third-party expert deadlines as well. So, Stephen, in response to your request, below, that's not a problem on my end given the foregoing.

Thank you,
Amy

From: Stephen Best <SBest@JSHFIRM.COM>

Sent: Wednesday, January 19, 2022 9:37 AM

To: pmanship@burgsimpson.com; diw@wb-law.com; barbaras@wb-law.com

Cc: Jessica Harmon (JHarmon@burgsimpson.com) <JHarmon@burgsimpson.com>; Grace McGregor Osberg <gosberg@burgsimpson.com>; admin@wb-law.com; Amy M. Wilkens <AWilkens@lorberlaw.com>; Diana Weeks <Dweeks@JSHFIRM.com>; Sabine Asser King <SAsserKing@JSHFIRM.COM>

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All,

Hope you are doing well. My expert recently left his firm for a new position. As such, he is experiencing difficulties with his prior firm transferring his files over to allow him to prepare his report for LeBlanc.

Is there any way I could get a two week extension until February 14th to allow my expert time to retrieve his file and prepare his report?

Regards,

[!\[\]\(bd1a142de767a21e5362c595f844a4ff_img.jpg\)STEPHEN F. BEST](#) | Associate

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