

EXHIBIT 13

From: [Shannon Huff](#)
To: [Amy M. Wilkens](#); [Sandra L. Voepel](#)
Cc: [Mohamad Tokko](#)
Subject: RE: Gallery Community Association v. K Hovnanian at Gallery, LLC, et al.
Date: Friday, March 11, 2022 12:55:00 PM
Attachments: [image001.png](#)

Hi Amy,

Thank you for taking time to discuss the expert report issues today. For the reasons discussed, we intend on moving forward with the Motion to preclude the untimely opinions unless your client will agree to withdraw the reports. Please confirm your position as soon as possible.

Thank you

From: Shannon Huff
Sent: Friday, March 11, 2022 11:54 AM
To: Amy M. Wilkens <AWilkens@lorberlaw.com>; Sandra L. Voepel <SVoepel@lorberlaw.com>
Cc: Mohamad Tokko <Mohamad.Tokko@raibarone.com>
Subject: RE: Gallery Community Association v. K Hovnanian at Gallery, LLC, et al.

Hi Amy,

I just tried you. I'm available most of today with the exception of 2-4pm PST. You can reach me at 480-226-1288.

Otherwise, Monday works after 11am PST. Thanks!

From: Amy M. Wilkens <AWilkens@lorberlaw.com>
Sent: Friday, March 11, 2022 11:51 AM
To: Shannon Huff <shuff@rdhfirm.com>; Sandra L. Voepel <SVoepel@lorberlaw.com>
Cc: Mohamad Tokko <MTokko@rdhfirm.com>
Subject: RE: Gallery Community Association v. K Hovnanian at Gallery, LLC, et al.

Shannon-

You can reach me at 602-285-4446. If we don't talk today, I'm available again on Monday. Thanks

From: Shannon Huff <shuff@rdhfirm.com>
Sent: Thursday, March 10, 2022 3:11 PM
To: Amy M. Wilkens <AWilkens@lorberlaw.com>; Sandra L. Voepel <SVoepel@lorberlaw.com>
Cc: Mohamad Tokko <MTokko@rdhfirm.com>
Subject: RE: Gallery Community Association v. K Hovnanian at Gallery, LLC, et al.

Amy,

Please give me a call to discuss your client's recent disclosures in this matter. As I previously discussed with you and with Holly prior to her departure from the firm, we did not agree to

allow your client to supplement its experts' opinions. Accordingly, we're requesting your client agree to withdraw the new opinions. If you will not voluntarily agree to withdraw, we'll proceed with filing a motion to preclude.

Please advise when you're available for a meet and confer. Thank you

From: Erikka A. Rico <ERico@lorberlaw.com>

Sent: Friday, February 25, 2022 5:32 PM

To: Amanda R. Hough <aah@jaburgwilk.com>; Barbara Stansil <barbaras@wb-law.com>; C. Cole Crabtree <ccc@jaburgwilk.com>; Craig S. Nuss <cnuss@burgsimpson.com>; David S. Schopick <dschopick@springelfink.com>; Dennis I. Wilenchik <diw@wb-law.com>; Jason J. Boblick <jasonboblick@smbattorneys.com>; Leonard T. Fink <lfink@springelfink.com>; Michael A. Ludwig <mludwig@jshfirm.com>; Michael Ryan Williams <phoenixlocal@libertymutual.com>; Mohamad Tokko <MTokko@rdhfirm.com>; Penny M. Manship <pmanship@burgsimpson.com>; Shannon Huff <shuff@rdhfirm.com>; Stephen F. Best <sbest@jshfirm.com>; Teresa Havashi Wales <twales@welshlawgroup.com>; Tom Shorall Jr. <tomshorall@smbattorneys.com>

Cc: Amy M. Wilkens <AWilkens@lorberlaw.com>; Sandra L. Voepel <SVoepel@lorberlaw.com>; admin@wb-law.com; agurka@welshlawgroup.com; bonniec@wb-law.com; chrissyverdino@smbattorneys.com; dianescheetz@smbattorneys.com; Grace McGregor Osberg <gosberg@burgsimpson.com>; Jessica Harmon <jharmon@burgsimpson.com>; kristen.chang@libertymutual.com; marioc@wb-law.com; minuteentries@jshfirm.com; minuteentries@welshlawgroup.com; smb@smbattorneys.com; tammys@wb-law.com; Tracy O'Brien <tobrien@rdhfirm.com>

Subject: Gallery Community Association v. K Hovnanian at Gallery, LLC, et al.

Counsel,

Attached please find Defendants'/Third-Party Plaintiffs' Third Supplemental Disclosure Statement. Hard copies will not be mailed unless requested. Please contact me if you have any issues with the link below containing disclosed documents.

 [3rd Supplemental Disclosure](#)

Erikka

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



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