

## **DAVID P GRIFFIN, PRO-SE**

TO: **Wray, Stefan** 441-9454 983-5852  
1143 Northwestern Avenue,  
Austin, Texas 78702,

This letter is to inform you that **David P. Griffin**, has filed a lawsuit against PACT and the City of Austin, Case Number: **D-I-GN-09-002028** Under the WHISTLE BLOWERS ACT.

### **Oral Depositions**

A notice of intent to take an oral deposition must be served on the witness and all parties a reasonable time before the deposition is taken. [Tex. R. Civ. P. 199.2\(a\)](#).

I feel that your personal testimony or documents that you may possess are vital in proving the facts in this case. Subpoenas will be issued in the coming weeks for this testimony. I have attempted to work with the two attorneys' to schedule these depositions, but as of the time of this letter. John Heller has responded but the tone of his message was counterproductive and not serious. The city needed 30 days Just to even schedule a meeting; this is a delay tactic, no serious effort to resolve this matter.

Discovery will proceed in this legal matter the depositions will be held in a conference room in one of the downtown hotels. They will be conducted Monday thru Saturday, from 9:00 AM to 9:00 PM. I will attempt to accommodate the people that can be there during business hours and those that have to appear after business hours special accommodations will be made to take their depositions on nights and weekends.

All testimony will be videotaped and a court reporter will be present as well. Please look thru your schedules for the two months of November 09, and December 09 inform me of your preferred dates to appear.

Listed below is the contact information for the attorneys involved and myself. If you have any questions please feel free to contact me. I will strongly recommend that you contact your own personal attorney for advice in this matter.

Thank you for your time and consideration.

John A. Heller, 70 N.E. Loop 410, Suite 1100 San Antonio, Texas 78216 210.734.7092 ext. 1117

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Sincerely Yours

David P. Griffin Por-Se