Renee S. Beach, et al. v. Gregory M. Parker, et al.

Case No. 2021-CP-25-00392

THE PARKER'S DEFENDANTS' MOTION TO DISQUALIFY ATTORNEY MARK TINSLEY

EXHIBIT H

PLAINTIFF'S COUNSEL EMAIL OF MAY 3, 2022

From: Mark Tinsley <mark@goodingandgooding.com>

Sent: Tuesday, May 3, 2022 10:38 AM

To: McWilliams, Susan P.

Cc: Moore, Mark C.; dbb@deborahbarbier.com; Ricard, Rhett D.; Ralph Tupper; Laine

Gooding; Tabor Vaux

Subject: Re: Beach v. Parker, et al. [IWOV-NPGVL1.FID1075329]

{EXTERNAL EMAIL}

Susie I forwarded the email from the Judge to Senator Senn on Friday. You obviously had not told Senator Senn that you intended to appeal and for her client not to comply with the Judge's order, as you had instructed them with regard to the subpoena. Then on Sunday morning Mr. Donahue sent me the documents which we reviewed.

I dispute that there was no final order compelling the production of the materials by Senator Senn's client or that Senator Senn's client had to wait until they received a form 4 order. If you all had intended to appeal the Judge's latest ruling, it seems the prudent thing would have been to have told the people subject to the subpoena not to comply with the court's order, but that was not done. Is it safe to conclude that you just got around to telling Senator Senn not to comply even though you still don't have the Form 4?

Mark Tinsley
Sent from my iPhone

On May 3, 2022, at 9:36 AM, McWilliams, Susan P. <SMcWilliams@nexsenpruet.com> wrote:

Mark,

We have just been informed that you apparently gave a copy of or informed Senator Senn of the email from Aimee Intagliata from Friday afternoon and have obtained documents from her client prior to any final order directing their production. The email is not an Order and as you know, Aimee indicated a Form 4 Order would be issued. From that Order, we intended to appeal as was contemplated by Judge Price's April 6th Order.

We request that you not review anything you have received, which as you know we contend are privileged and any review by you at this time is improper. We also request that you return those materials to us immediately. We intend to seek relief from an appellate court.

Susi

Susan P. McWilliams

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