

**Subject:** Re: Medicaid Database

**From:** Jim Gottstein <jim.gottstein@psychrights.org>

**Date:** Mon, 02 Feb 2009 12:28:26 -0900

**To:** "Bakalar, Elizabeth M (LAW)" <libby.bakalar@alaska.gov>

**CC:** "Kraly, Stacie L (LAW)" <stacie.kraly@alaska.gov>, Jim Gottstein <jim.gottstein@psychrights.org>

Hi Libby,

Bakalar, Elizabeth M (LAW) wrote:

Hi Jim,

We'd prefer to do any meetings with Dave through a formal deposition. If you have some particular data query in mind that you're thinking of, you can run it by us and we'll talk to Dave. But this is a complex suit of significant proportion/impact with potentially lots of discovery, and we want to make sure all our dots are connected properly (i.e. discovery is formalized and done via Civil Rules). So let's just do this as a deposition on the record.

That's fine.

On that topic, and in response to your other email, we will accept deposition subpoenas for defendants/employees

Thanks. I assume I can serve them to the Anchorage office.

, but first can you let us know (a) whom you want deposed;

I sent you a draft of a Rule 30(b)(6) notice, so other than Mr. Campana, who I think we all agree is the person to depose about Medicaid records, for at least the first round, you will be designating the persons to testify about the identified topics.

(b) the time frame in which you want to depose them, being mindful that many of the principals will be jammed up with legislative business during the session—we can then check on availability of those you want deposed, and you can notice the depositions and we can get them scheduled as fast as possible.

I'd like to depose Mr. Campana as soon as possible, at least within the next couple of weeks. I will also need to coordinate with my database person. It seems like we ought to be able to work up a schedule for the others that will work for both of us. I'll probably just set a date for the 30(b)(6) depositions for maybe three weeks out and then we can make adjustments to accommodate the various witnesses' schedules.

I got your voice mail but I am swamped today—if there's anything else you need that's not addressed here, please feel free to try me again.

Thanks for getting back to me.

Best,  
Libby

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**From:** Jim Gottstein [<mailto:jim.gottstein@psychrights.org>]  
**Sent:** Thursday, January 29, 2009 12:46 PM  
**To:** Bakalar, Elizabeth M (LAW); Kraly, Stacie L (LAW)  
**Subject:** Medicaid Database

Hi Libby and Stacie,

Can we meet informally with David Campana in the near future to formulate a request for production of computerized Medicaid records rather than take his deposition. What I'd like to do is meet with him with our computer person to formulate the request for production. I am not asking that you waive any rights to object to a request for production.

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