

**Subject:** RE: Discovery in Psych Rights  
**From:** "Bakalar, Elizabeth M (LAW)" <libby.bakalar@alaska.gov>  
**Date:** Tue, 24 Feb 2009 16:51:10 -0900  
**To:** Jim Gottstein <jim.gottstein@psychrights.org>  
**CC:** "Kraly, Stacie L (LAW)" <stacie.kraly@alaska.gov>

That's fine, with the understanding that we're not agreeing to a date certain at this point and re-notice will be subject to further discussions and/or motion practice as we get closer to the time. So I believe we're on the same page with how to proceed.

Libby Bakalar  
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**From:** Jim Gottstein [mailto:[jim.gottstein@psychrights.org](mailto:jim.gottstein@psychrights.org)]  
**Sent:** Tuesday, February 24, 2009 4:17 PM  
**To:** Bakalar, Elizabeth M (LAW)  
**Cc:** Kraly, Stacie L (LAW); Lisa Smith  
**Subject:** Re: Discovery in Psych Rights

Hi Libby,

I will serve you with a re-notice of deposition for say three weeks out, which when we get closer we will presumably have another discussion about.

Bakalar, Elizabeth M (LAW) wrote:

Good enough Jim, we understand that concern. Thanks for your understanding and courtesy on this point and we will be in touch. Procedurally, will you be issuing a notice that cancels Thursday's deposition?

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**From:** Jim Gottstein [mailto:[jim.gottstein@psychrights.org](mailto:jim.gottstein@psychrights.org)]  
**Sent:** Tuesday, February 24, 2009 3:51 PM  
**To:** Bakalar, Elizabeth M (LAW)  
**Cc:** Kraly, Stacie L (LAW); Lisa Smith  
**Subject:** Re: Discovery in Psych Rights

Hi Libby,

I will agree to postpone it for two weeks or maybe a bit more, but I don't think I can agree to anything that open-ended.

Bakalar, Elizabeth M (LAW) wrote:

Jim,

In preparing for Dave Campana's upcoming deposition, Stacie and I have taken a more extensive look at the complaint and we have concerns about engaging in discovery at this point. As a result of our review we are preparing a dispositive motion that we hope to file in the next two weeks. Therefore we would request that you agree to postpone Dave's deposition until after the court has ruled on our motion. If you are unable to agree to that postponement, we'll file an expedited motion to quash the deposition on similar grounds. We apologize for the late notice but we need to know by COB today if you can agree to this plan.

Libby

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Law Project for  
Psychiatric Rights

The Law Project for Psychiatric Rights is a public interest law firm devoted to the defense of people facing the horrors of forced psychiatric drugging. We are further dedicated to exposing the truth about these drugs and the courts being misled into ordering people to be drugged and subjected to other brain and body damaging interventions against their will. Extensive information about this is available on our web site, <http://psychrights.org/>. Please donate generously. Our work is fueled with your IRS 501(c) tax deductible donations. Thank you for your ongoing help and support.

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James B. (Jim) Gottstein, Esq.