

January 29, 2014

VIA EMAIL

Mr. Alex Higdon

and

Mrs. Jane Higdon
c/o Shiel Edlin, Esq.

Re: Higdon v. Higdon – Deposition Request

Dear Parties:

I am writing today regarding a request that has been made for my deposition. It is my understanding that Mr. Higdon would like to depose me in the above-referenced matter. By this letter, I am neither acknowledging the validity, or the proper receipt of any deposition notice. Further, I am not waiving any objection I may have thereto, or that any contact from Mr. Higdon is proper, consented to, and not criminal, in violation of the law or an order, or further harassment from Mr. Higdon.

I am however, willing to allow a deposition. However, for safety and security reasons, the same will be met with my conditions and at a time and place that I designate.

With that said, I think it is important to note that I do not have an interest in this matter. I was neither the judge, the guardian ad litem, nor an attorney representing a party in this case. My tenure with the court concluded over a year ago. At one given time, my court had a docket of 650 to 700 cases that I oversaw. I was extremely passionate about my job, the cases, and the efficiency of the court for the parties and the attorneys. However, the passion I had for my job, while I performed it, does not lend to the idea that I remember intricacies and details of one case, above 700 others after a year that my employment ended.

Notwithstanding the same, with the passage of time and after enduring the stress of Mr. Higdon's harassment I do not remember anything about the above-referenced case. I cannot be sure as to which orders were provided by counsel or written by the office staff or judge. I do not know any helpful details, nor do I wish to know the same. I was not involved in this matter as a party, judge, attorney, or a guardian ad litem. Mrs. Higdon may attest to her counsel that I rarely

While I do not have anything of substance to contribute about the details of this case when it was before Judge Tusan, again I will not resist to being deposed (once, and only in this matter). Albeit, I reserve the right to withdraw this "consent," and I do not waive my objections to the same. Furthermore, I note that by the laws of this state, Mr. Higdon is not entitled to discovery or to take my deposition. (To that end, if opposing counsel objects to me being deposed or discovery efforts, then I will not sit for a deposition.).