

IN THE CIRCUIT COURT, SEVENTH  
JUDICIAL CIRCUIT, IN AND FOR  
ST. JOHNS COUNTY, FLORIDA

CASE NO.: 2025-CA-001320A000MX

BRADLEY BYRD, an individual, and  
ANNA BYRD, an individual,

Plaintiffs,

v.

COSTCO WHOLESALE CORPORATION,  
a foreign for profit corporation, COSTCO-  
INNOVEL SOLUTIONS, LLC, d/b/a COSTCO  
WHOLESALE LOGISTICS, a foreign limited  
Liability company, and RXO LAST MILE, INC.,  
a foreign for profit corporation,

Defendants.

---

**DEFENDANT'S MOTION TO COMPEL PLAINTIFFS' DEPOSITION DATES**

Defendant, Costco Wholesale Corporation, moves this Court, pursuant to Rules 1.310, 1.380, Florida Rules of Civil Procedure, to Order Plaintiffs to produce dates and time slots they are available for deposition. Defendant states:

1. This case arises out of a December 2, 2024 alleged negligent home-installation of a refrigerator Plaintiffs purchased at Costco.
2. On September 19, 2025 [Doc. 5], Plaintiffs filed the operative Complaint.
3. On December 10, 2025 and December 15, 2025, Defendants answered Plaintiffs' Complaint. [Docs. 18 and 24].
4. On December 10, 2025, December 15, 2025 and January 5, 2026, the parties exchanged initial disclosures, respectively. [Docs. 19, 25, and 37].
5. On December 15, 2025, Defendants requested Plaintiffs' availability for depositions so they could be scheduled, however, Plaintiffs did not respond. (**Exhibit A**).

6. On December 31, 2025, Defendants inquired about deposition dates and Plaintiffs did not respond. (**Exhibit B**).

7. On January 2, 2026, Defendants again inquired about deposition dates and Plaintiffs did not respond. (**Exhibit C**).

8. On January 21, 2026, Defendants inquired about deposition dates and on January 23, 2026, Plaintiffs responded by suggesting the third (3<sup>rd</sup>) week of February but did not provide specific dates or timeslots for the depositions. (**Exhibit D**).

9. On January 28, 2026, Defendants again inquired about deposition dates and timeslots in the third (3<sup>rd</sup>) week of February and Plaintiffs did not respond with same. (**Exhibit E**).

10. On January 29, 2026, Defendants inquired about deposition dates and provided a final deadline of Friday, January 30, 2026 to receive same. Plaintiffs did not provide dates and timeslots by the final deadline, necessitating this Motion. (**Exhibit F**).

WHEREFORE, Defendant requests this Court order Plaintiffs to produce dates and timeslots they are available to be deposed as soon as possible. Defendants have made six (6) attempts to obtain dates and timeslots, to no avail. Defendant also requests its attorneys' fees and costs associated with this motion as sanctions, as this Motion should have been wholly unnecessary.

#### **CERTIFICATE OF CONFERRAL PRIOR TO FILING**

I certify that prior to filing this motion, Defendant attempted to resolve this matter on numerous occasions with Plaintiffs' counsel to no avail. See Exhibits A - F.

#### **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished to John D. "Jack" Webb, Esq., 1662 Stockton Street, Suite 201, Jacksonville, FL 32204,

(Counsel for Plaintiffs), [jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com); [arichey@jackwebblaw.com](mailto:arichey@jackwebblaw.com), and [Jupton@jackwebblaw.com](mailto:Jupton@jackwebblaw.com), Heather L. Stover, Esq. and Richard S. Maselli, Esq., Ogden Sullivan, 5422 Bay Center Drive, Suite 100, Tampa, FL 33609, (Counsel or Defendant RXO), [hstover@ogdensullivan.com](mailto:hstover@ogdensullivan.com), [RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com), and [Eservice@ogdensullivan.com](mailto:Eservice@ogdensullivan.com), via Florida E-Portal, this 30<sup>th</sup> day of January, 2026.

**JAKAB LAW, PLLC**

**/s/ Kevin E. Jakab, Esq.**

**KEVIN E. JAKAB, ESQ.**

Florida Bar No.: 667811

6277 Dupont Station E., Suite 3

Jacksonville, FL 32217

(904) 683-2290 (t)/ 904) 683-7588 (f)

[kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)

Attorney for Defendant Costco

# **EXHIBIT A**

---

**From:** Lisa Reagor  
**Sent:** Monday, December 15, 2025 3:04 PM  
**To:** jwebb@jackwebblaw.com; arichey@jackwebblaw.com; jupton@jackwebblaw.com;  
'Richard Maselli'; Arletty Rangel; Kevin Jakab  
**Subject:** RE: Byrd, Bradley v. Costco and RXO Last Mile

<b>Tracking:</b>	<b>Recipient</b>	<b>Delivery</b>
	jwebb@jackwebblaw.com	
	arichey@jackwebblaw.com	
	jupton@jackwebblaw.com	
	'Richard Maselli'	
	Arletty Rangel	
	Kevin Jakab	Delivered: 12/15/2025 3:04 PM

Good afternoon,

Defendants would like to take both Plaintiffs' depositions (via Zoom) in the month of February 2026. Please provide 3 or 4 available dates and Defendants will match.

Thank you,

*Lisa Reagor*

Office Manager and Legal Assistant

Kevin E. Jakab, Esq.

Jakab Law, PLLC

6277 Dupont Station Court East, Suite 3

Jacksonville, FL 32217

904-683-2290 (t)

904-683-7588 (f)

[lreagor@jakablaw.com](mailto:lreagor@jakablaw.com)

CONFIDENTIALITY NOTICE: This e-mail message including attachments, if any, is intended for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. Thank you.

# **EXHIBIT B**

---

**From:** Kevin Jakab  
**Sent:** Wednesday, December 31, 2025 10:41 AM  
**To:** Richard Maselli; Jack Webb  
**Cc:** Dawnye'l Mauck; Lisa Reagor  
**Subject:** RE: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001

Also, have we settled on any deposition dates for Plaintiffs?

**Kevin Jakab, Esq.**

Board Certified Civil Trial Lawyer  
Florida Supreme Court Certified Circuit Mediator  
Jakab Law, PLLC  
6277 Dupont Station Ct, Suite 3  
Jacksonville, FL 32217  
904-683-2290 (p)  
904-683-7588 (f)  
Email: [kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)  
Website: [www.JakabLaw.com](http://www.JakabLaw.com)

---

**From:** Richard Maselli <RMaselli@ogdensullivan.com>  
**Sent:** Wednesday, December 31, 2025 10:38 AM  
**To:** Jack Webb <jwebb@jackwebblaw.com>  
**Cc:** Kevin Jakab <kjakab@jakablaw.com>; Dawnye'l Mauck <DMAuck@ogdensullivan.com>  
**Subject:** RE: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001

Jack,

Thanks for your e-mail. To confirm, you are in agreement that the Plaintiff's discovery including RFAs will not be deemed served until the initial disclosures are served. Thanks for confirming this.

Best regards,

Rich

**Richard S. Maselli, Esquire**

---

Ogden Sullivan Stover & Saar, P.A.  
5422 Bay Center Dr., Suite 100, Tampa, FL 33609  
O: 813.223.5111 | F: 813.229.2336  
D: 813.262.2052 | C: 727.743.5006  
[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)  
[www.ogdensullivan.com](http://www.ogdensullivan.com)



This e-mail message, including any attachments and appended messages, is for the sole use of the intended recipients and may contain confidential and legally privileged information.

If you are not the intended recipient, any review, dissemination, distribution, copying, storage or other use of all or any portion of this message is strictly prohibited.

If you received this message in error, please immediately notify the sender by reply e-mail and delete this message in its entirety.

---

**From:** Jack Webb <[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)>

**Sent:** Wednesday, December 31, 2025 10:18 AM

**To:** Richard Maselli <[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)>

**Cc:** Kevin Jakab <[kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)>; Dawnye'l Mauck <[DMAuck@ogdensullivan.com](mailto:DMAuck@ogdensullivan.com)>

**Subject:** Re: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001

We will get the initial disclosures immediately. Not sure why this has not already been addressed but will get it taken care of. Thanks.

John D. "Jack" Webb, Esq.

(904) 803-4686

[www.jackwebblaw.com](http://www.jackwebblaw.com)

# **EXHIBIT C**

---

**From:** Richard Maselli <RMaselli@ogdensullivan.com>  
**Sent:** Friday, January 2, 2026 10:35 AM  
**To:** Kevin Jakab; Jack Webb  
**Cc:** Dawnye'l Mauck; Lisa Reagor; Jessica Smith  
**Subject:** RE: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001

Jack,

Following up on depo dates for your clients and also confirming that you will be providing the initial disclosures and that the 30 day response time on the discovery served previously will not start until we receive the plaintiff's initial disclosures. Under the rules, parties are not permitted to serve discovery until the initial disclosures are served. This all needs to be confirmed in short order so we do not have to file what should be unnecessary motions.

Thanks in advance for your cooperation.

Rich

## Richard S. Maselli, Esquire

---

Ogden Sullivan Stover & Saar, P.A.  
5422 Bay Center Dr., Suite 100, Tampa, FL 33609  
O: 813.223.5111 | F: 813.229.2336  
D: 813.262.2052 | C: 727.743.5006  
[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)  
[www.ogdensullivan.com](http://www.ogdensullivan.com)



This e-mail message, including any attachments and appended messages, is for the sole use of the intended recipients and may contain confidential and legally privileged information. If you are not the intended recipient, any review, dissemination, distribution, copying, storage or other use of all or any portion of this message is strictly prohibited. If you received this message in error, please immediately notify the sender by reply e-mail and delete this message in its entirety.

---

**From:** Kevin Jakab <kjakab@jakablaw.com>  
**Sent:** Wednesday, December 31, 2025 10:41 AM  
**To:** Richard Maselli <RMaselli@ogdensullivan.com>; Jack Webb <jwebb@jackwebblaw.com>  
**Cc:** Dawnye'l Mauck <DMAuck@ogdensullivan.com>; Lisa Reagor <LReagor@jakablaw.com>  
**Subject:** RE: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001

Also, have we settled on any deposition dates for Plaintiffs?

## Kevin Jakab, Esq.

Board Certified Civil Trial Lawyer  
Florida Supreme Court Certified Circuit Mediator

### Jakab Law, PLLC

6277 Dupont Station Ct, Suite 3

Jacksonville, FL 32217

904-683-2290 (p)

904-683-7588 (f)

Email: [kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)

Website: [www.JakabLaw.com](http://www.JakabLaw.com)

---

**From:** Richard Maselli <[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)>

**Sent:** Wednesday, December 31, 2025 10:38 AM

**To:** Jack Webb <[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)>

**Cc:** Kevin Jakab <[kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)>; Dawnye'l Mauck <[DMAuck@ogdensullivan.com](mailto:DMAuck@ogdensullivan.com)>

**Subject:** RE: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001

Jack,

Thanks for your e-mail. To confirm, you are in agreement that the Plaintiff's discovery including RFAs will not be deemed served until the initial disclosures are served. Thanks for confirming this.

Best regards,

Rich

## Richard S. Maselli, Esquire

---

Ogden Sullivan Stover & Saar, P.A.

5422 Bay Center Dr., Suite 100, Tampa, FL 33609

O: 813.223.5111 | F: 813.229.2336

D: 813.262.2052 | C: 727.743.5006

[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)

[www.ogdensullivan.com](http://www.ogdensullivan.com)



This e-mail message, including any attachments and appended messages, is for the sole use of the intended recipients and may contain confidential and legally privileged information.

If you are not the intended recipient, any review, dissemination, distribution, copying, storage or other use of all or any portion of this message is strictly prohibited.

If you received this message in error, please immediately notify the sender by reply e-mail and delete this message in its entirety.

---

**From:** Jack Webb <[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)>

**Sent:** Wednesday, December 31, 2025 10:18 AM

**To:** Richard Maselli <[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)>

Cc: Kevin Jakab <[kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)>; Dawnye'I Mauck <[DMAuck@ogdensullivan.com](mailto:DMAuck@ogdensullivan.com)>  
Subject: Re: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001

We will get the initial disclosures immediately. Not sure why this has not already been addressed but will get it taken care of. Thanks.

John D. "Jack" Webb, Esq.  
(904) 803-4686  
[www.jackwebblaw.com](http://www.jackwebblaw.com)

# EXHIBIT D

---

**From:** Richard Maselli <RMaselli@ogdensullivan.com>  
**Sent:** Wednesday, January 21, 2026 11:30 AM  
**To:** Jack Webb; Kevin Jakab  
**Cc:** Lisa Reagor; Alexis Richey; Jill Upton; Dawnye'l Mauck  
**Subject:** RE: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001: Byrd, Bradley v. Costco and RXO--Costco's discovery responses and MPO-CA, 1-14-26

Jack,

We've been asking for depo dates for your clients for a while and now we are waiting on discovery responses. Obviously we want to work with you on these type of matters but we also need to move forward. Please advise on your clients' availability for deposition and provide a status of discovery by 5pm on Friday, 1/23 or we will need to file a MTC.

Thanks,

Rich

## Richard S. Maselli, Esquire

---

Ogden Sullivan Stover & Saar, P.A.  
5422 Bay Center Dr., Suite 100, Tampa, FL 33609  
O: 813.223.5111 | F: 813.229.2336  
D: 813.262.2052 | C: 727.743.5006  
[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)  
[www.ogdensullivan.com](http://www.ogdensullivan.com)



This e-mail message, including any attachments and appended messages, is for the sole use of the intended recipients and may contain confidential and legally privileged information. If you are not the intended recipient, any review, dissemination, distribution, copying, storage or other use of all or any portion of this message is strictly prohibited. If you received this message in error, please immediately notify the sender by reply e-mail and delete this message in its entirety.

**From:** Jack Webb <jwebb@jackwebblaw.com>  
**Sent:** Wednesday, January 14, 2026 12:59 PM  
**To:** Kevin Jakab <kjakab@jakablaw.com>; Richard Maselli <RMaselli@ogdensullivan.com>  
**Cc:** Lisa Reagor <LReagor@jakablaw.com>; Alexis Richey <arichey@jackwebblaw.com>; Jill Upton <jupton@jackwebblaw.com>; Heather L. Stover <HStover@ogdensullivan.com>; DeAnna Blanton <dblanton@ogdensullivan.com>; Dawnye'l Mauck <DMAuck@ogdensullivan.com>  
**Subject:** Re: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001: Byrd, Bradley v. Costco and RXO--Costco's discovery responses and MPO-CA, 1-14-26

Thanks. We will review and respond. We are requesting a week extension on our responses. We have all the docs but need to get them organized. I will send you deposition dates tomorrow. Just getting out of a hearing.

John D. "Jack" Webb, Esq.  
(904) 803-4686  
[www.jackwebblaw.com](http://www.jackwebblaw.com)

On Jan 23, 2026, at 1:58 PM, Richard Maselli <[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)> wrote:

All,

3<sup>rd</sup> week in Feb should work- pls send proposed dates.

Jack, I may have missed it but have you sent Plaintiffs' responses to RXO's discovery?

Thanks,

Rich

**Richard S. Maselli, Esquire**

<image001.png>

Ogden Sullivan Stover & Saar, P.A.

5422 Bay Center Dr., Suite 100, Tampa, FL 33609

O: 813.223.5111 | F: 813.229.2336

D: 813.262.2052 | C: 727.743.5006

[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)

[www.ogdensullivan.com](http://www.ogdensullivan.com)

<image002.png>

This e-mail message, including any attachments and appended messages, is for the sole use of the intended recipients and may contain confidential and legally privileged information.

If you are not the intended recipient, any review, dissemination, distribution, copying, storage or other use of all or any portion of this message is strictly prohibited.

If you received this message in error, please immediately notify the sender by reply e-mail and delete this message in its entirety.

**From:** Kevin Jakab <[kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)>  
**Sent:** Friday, January 23, 2026 1:24 PM  
**To:** Jack Webb <[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)>; Richard Maselli <[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)>  
**Cc:** Lisa Reagor <[LReagor@jakablaw.com](mailto:LReagor@jakablaw.com)>; Alexis Richey <[arichey@jackwebblaw.com](mailto:arichey@jackwebblaw.com)>; Jill Upton <[jupton@jackwebblaw.com](mailto:jupton@jackwebblaw.com)>; Dawnye'l Mauck <[DMAuck@ogdensullivan.com](mailto:DMAuck@ogdensullivan.com)>  
**Subject:** RE: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001: Byrd, Bradley v. Costco and RXO--Costco's discovery responses and MPO-CA, 1-14-26

Jack:

You can send some times/dates that week and I should be able to match. Richard?

### Kevin Jakab, Esq.

Board Certified Civil Trial Lawyer  
Florida Supreme Court Certified Circuit Mediator  
**Jakab Law, PLLC**  
6277 Dupont Station Ct, Suite 3  
Jacksonville, FL 32217  
904-683-2290 (p)  
904-683-7588 (f)  
Email: [kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)  
Website: [www.JakabLaw.com](http://www.JakabLaw.com)

**From:** Jack Webb <[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)>  
**Sent:** Friday, January 23, 2026 1:02 PM  
**To:** Richard Maselli <[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)>  
**Cc:** Kevin Jakab <[kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)>; Lisa Reagor <[LReagor@jakablaw.com](mailto:LReagor@jakablaw.com)>; Alexis Richey <[arichey@jackwebblaw.com](mailto:arichey@jackwebblaw.com)>; Jill Upton <[jupton@jackwebblaw.com](mailto:jupton@jackwebblaw.com)>; Dawnye'l Mauck <[DMAuck@ogdensullivan.com](mailto:DMAuck@ogdensullivan.com)>  
**Subject:** Re: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001: Byrd, Bradley v. Costco and RXO--Costco's discovery responses and MPO-CA, 1-14-26

Thinking about 3rd week in February for depositions. Let me know your thoughts?

John D. "Jack" Webb, Esq.

John D. Webb, P.A.

1662 Stockton Street, Suite 201

Jacksonville, Florida 32204

(904) 803-4686

[www.jackwebblaw.com](http://www.jackwebblaw.com)

\*\*\*This is a transmission from the law firm of John D. Webb, P.A. and may contain information which is privileged, confidential, and protected by the attorney-client or attorney work product privileges. If you are not the addressee or intended recipient, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this transmission in error, please destroy it and notify us immediately at our telephone number (904) 803-4686.\*\*\*

On Jan 21, 2026, at 11:30 AM, Richard Maselli  
<[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)> wrote:

Jack,

We've been asking for depo dates for your clients for a while and now we are waiting on discovery responses. Obviously we want to work with you on these type of matters but we also need to move forward. Please advise on your clients' availability for deposition and provide a status of discovery by 5pm on Friday, 1/23 or we will need to file a MTC.

Thanks,

Rich

## **Richard S. Maselli, Esquire**

<image001.png>

Ogden Sullivan Stover & Saar, P.A.  
5422 Bay Center Dr., Suite 100, Tampa, FL 33609  
O: 813.223.5111 | F: 813.229.2336  
D: 813.262.2052 | C: 727.743.5006  
[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)  
[www.ogdensullivan.com](http://www.ogdensullivan.com)

<image002.png>

This e-mail message, including any attachments and appended messages, is for the sole use of the intended recipients and may contain confidential and legally privileged information.

If you are not the intended recipient, any review, dissemination, distribution, copying, storage or other use of all or any portion of this message is strictly prohibited.

If you received this message in error, please immediately notify the sender by reply e-mail and delete this message in its entirety.

**From:** Jack Webb <[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)>  
**Sent:** Wednesday, January 14, 2026 12:59 PM  
**To:** Kevin Jakab <[kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)>; Richard Maselli <[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)>  
**Cc:** Lisa Reagor <[LReagor@jakablaw.com](mailto:LReagor@jakablaw.com)>; Alexis Richey <[arichey@jackwebblaw.com](mailto:arichey@jackwebblaw.com)>; Jill Upton <[jupton@jackwebblaw.com](mailto:jupton@jackwebblaw.com)>; Heather L. Stover <[HStover@ogdensullivan.com](mailto:HStover@ogdensullivan.com)>; DeAnna Blanton <[dblanton@ogdensullivan.com](mailto:dblanton@ogdensullivan.com)>; Dawnye'I Mauck <[DMAuck@ogdensullivan.com](mailto:DMAuck@ogdensullivan.com)>  
**Subject:** Re: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001: Byrd, Bradley v. Costco and RXO--Costco's discovery responses and MPO-CA, 1-14-26

Thanks. We will review and respond. We are requesting a week extension on our responses. We have all the docs but need to get them organized. I will send you deposition dates tomorrow. Just getting out of a hearing.

John D. "Jack" Webb, Esq.  
(904) 803-4686  
[www.jackwebblaw.com](http://www.jackwebblaw.com)

<image003.jpg>

\*\*\*This is a transmission from the law firm of John D. Webb, P.A. and may contain information which is privileged, confidential, and protected by the attorney-client or attorney work product privileges. If you are not the addressee or intended recipient, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this transmission in error, please destroy it and notify us immediately at our telephone number (904) 803-4686.\*\*\*

---

**From:** Kevin Jakab <[kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)>  
**Sent:** Wednesday, January 14, 2026 11:42 AM  
**To:** Jack Webb <[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)>; Richard Maselli <[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)>  
**Cc:** Lisa Reagor <[LReagor@jakablaw.com](mailto:LReagor@jakablaw.com)>; Alexis Richey <[arichey@jackwebblaw.com](mailto:arichey@jackwebblaw.com)>; Jill Upton <[jupton@jackwebblaw.com](mailto:jupton@jackwebblaw.com)>; Heather L. Stover <[hstover@ogdensullivan.com](mailto:hstover@ogdensullivan.com)>; DeAnna Blanton <[dblanton@ogdensullivan.com](mailto:dblanton@ogdensullivan.com)>; Dawnye'l Mauck <[dmauck@ogdensullivan.com](mailto:dmauck@ogdensullivan.com)>  
**Subject:** Byrd, Bradley v. Costco and RXO--Costco's discovery responses and MPO-CA, 1-14-26

Jack and Richard:

We are in the process of finalizing Costco's responses to P's discovery requests, however, in all their cases, Costco requires an MPO/Confidentiality Agreement.

1. *Attached* is the Confidentiality Agreement. Absent objection, please sign and return.
1. If anyone objects, let me know before close of business tomorrow (1-15-26), so I can file Costco's objections and the MPO w/ the proposed CA. We will then request a hearing (30 mins.), ASAP.

Unfortunately, I cannot send Costco's responses to Plaintiff's discovery requests w/out a CA in place.

Thank you, kj.

**Kevin Jakab, Esq.**  
Board Certified Civil Trial Lawyer  
Florida Supreme Court Certified Circuit Mediator

**Jakab Law, PLLC**  
6277 Dupont Station Ct, Suite 3  
Jacksonville, FL 32217  
904-683-2290 (p)  
904-683-7588 (f)  
Email: [kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)  
Website: [www.JakabLaw.com](http://www.JakabLaw.com)

---

**From:** Jack Webb <[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)>  
**Sent:** Monday, January 12, 2026 2:02 PM  
**To:** Richard Maselli <[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)>  
**Cc:** Kevin Jakab <[kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)>  
**Subject:** Re: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001

Sorry the answer to your question is yes. Out siick.

John D. "Jack" Webb, Esq.  
(904) 803-4686  
[www.jackwebblaw.com](http://www.jackwebblaw.com)

<image003.jpg>

\*\*\*This is a transmission from the law firm of John D. Webb, P.A. and may contain information which is privileged, confidential, and protected by the attorney-client or attorney work product privileges. If you are not the addressee or intended recipient, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this transmission in error, please destroy it and notify us immediately at our telephone number (904) 803-4686.\*\*\*

---

**From:** Richard Maselli <[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)>  
**Sent:** Monday, January 12, 2026 1:53 PM  
**To:** Jack Webb <[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)>  
**Cc:** Kevin Jakab <[kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)>  
**Subject:** RE: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001

Jack,

Just left you a vm. Following up on your agreement to deem plaintiff's discovery including rfa's to be deemed served as of the date of initial disclosures on January 5. I have asked you this simple question multiple times and have not received a direct response. I'd rather not file a motion but you are leaving me little choice. Also, Kevin and I need dates for your clients' depositions.

Please advise.

Rich

**Richard S. Maselli, Esquire**

<image001.png>

Ogden Sullivan Stover & Saar, P.A.  
5422 Bay Center Dr., Suite 100, Tampa, FL 33609  
O: 813.223.5111 | F: 813.229.2336  
D: 813.262.2052 | C: 727.743.5006  
[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)  
[www.ogdensullivan.com](http://www.ogdensullivan.com)

<image002.png>

This e-mail message, including any attachments and appended messages, is for the sole use of the intended recipients and may contain confidential and legally privileged information.

If you are not the intended recipient, any review, dissemination, distribution, copying, storage or other use of all or any portion of this message is strictly prohibited.

If you received this message in error, please immediately notify the sender by reply e-mail and delete this message in its entirety.

---

**From:** Richard Maselli

**Sent:** Friday, January 9, 2026 2:57 PM

**To:** Jack Webb <[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)>

**Cc:** Kevin Jakab <[kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)>

**Subject:** RE: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001

Jack,

So you are agreeing to the plaintiff's discovery including admissions being deemed served as of 1/5 (when you served the disclosures)?

Rich

**Richard S. Maselli, Esquire**

<image001.png>

Ogden Sullivan Stover & Saar, P.A.  
5422 Bay Center Dr., Suite 100, Tampa, FL 33609  
O: 813.223.5111 | F: 813.229.2336  
D: 813.262.2052 | C: 727.743.5006  
[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)  
[www.ogdensullivan.com](http://www.ogdensullivan.com)

<image002.png>

This e-mail message, including any attachments and appended messages, is for the sole use of the intended recipients and may contain confidential and legally privileged information.

If you are not the intended recipient, any review, dissemination, distribution,

copying, storage or other use of all or any portion of this message is strictly prohibited.

If you received this message in error, please immediately notify the sender by reply e-mail and delete this message in its entirety.

**From:** Jack Webb <[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)>

**Sent:** Friday, January 9, 2026 2:42 PM

**To:** Richard Maselli <[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)>

**Cc:** Kevin Jakab <[kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)>

**Subject:** Re: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001

Thanks. We will address any procedural defects. No motion is necessary. Let's talk next week about deposition dates.

John D. "Jack" Webb, Esq.

John D. Webb, P.A.

1662 Stockton Street, Suite 201

Jacksonville, Florida 32204

(904) 803-4686

[www.jackwebblaw.com](http://www.jackwebblaw.com)

\*\*\*This is a transmission from the law firm of John D. Webb, P.A. and may contain information which is privileged, confidential, and protected by the attorney-client or attorney work product privileges. If you are not the addressee or intended recipient, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this transmission in error, please destroy it and notify us immediately at our telephone number (904) 803-4686.\*\*\*

On Jan 9, 2026, at 2:34 PM, Richard Maselli <[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)> wrote:

Jack,

I left you another vm but I have not heard back. I'd rather not file a motion but the plaintiff's service of the discovery including admissions was not in compliance with the rules. I'm willing to have the discovery and admissions to be deemed served as of the date the plaintiff's disclosures were served. If we can't come to an agreement, we will move to strike the served discovery and seeks fees for the trouble of filing the motion. Please advise.

Rich

**Richard S. Maselli, Esquire**

<image001.png>

Ogden Sullivan Stover & Saar, P.A.

5422 Bay Center Dr., Suite 100, Tampa, FL 33609  
O: 813.223.5111 | F: 813.229.2336  
D: 813.262.2052 | C: 727.743.5006  
[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)  
[www.ogdensullivan.com](http://www.ogdensullivan.com)

<image002.png>

This e-mail message, including any attachments and appended messages, is for the sole use of the intended recipients and may contain confidential and legally privileged information.

If you are not the intended recipient, any review, dissemination, distribution, copying, storage or other use of all or any portion of this message is strictly prohibited.

If you received this message in error, please immediately notify the sender by reply e-mail and delete this message in its entirety.

# **EXHIBIT E**

---

**From:** Kevin Jakab  
**Sent:** Wednesday, January 28, 2026 9:26 AM  
**To:** Jack Webb; Richard Maselli  
**Cc:** Lisa Reagor; Alexis Richey; Jill Upton; Dawnye'l Mauck  
**Subject:** RE: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001: Byrd, Bradley v. Costco and RXO--Costco's discovery responses and MPO-CA, 1-14-26

Jack:

Did your office forward timeslots for the depositions in this case for third (3<sup>rd</sup>) week of February? We would like to get these noticed.

- Brad Byrd—full day
- Anna Byrd—half day.

Also, please forward their driver's licenses, front & back. They were referenced in the RTP but not forwarded. We can get their SS #s via a phone call.

Ty, kj.

**Kevin Jakab, Esq.**

Board Certified Civil Trial Lawyer  
Florida Supreme Court Certified Circuit Mediator  
Jakab Law, PLLC  
6277 Dupont Station Ct, Suite 3  
Jacksonville, FL 32217  
904-683-2290 (p)  
904-683-7588 (f)  
Email: [kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)  
Website: [www.JakabLaw.com](http://www.JakabLaw.com)

**From:** Kevin Jakab  
**Sent:** Friday, January 23, 2026 1:24 PM  
**To:** 'Jack Webb' <jwebb@jackwebblaw.com>; Richard Maselli <RMaselli@ogdensullivan.com>  
**Cc:** Lisa Reagor <LReagor@jakablaw.com>; Alexis Richey <arichey@jackwebblaw.com>; Jill Upton <jupton@jackwebblaw.com>; Dawnye'l Mauck <DMAuck@ogdensullivan.com>  
**Subject:** RE: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001: Byrd, Bradley v. Costco and RXO--Costco's discovery responses and MPO-CA, 1-14-26

Jack:

You can send some times/dates that week and I should be able to match. Richard?

**Kevin Jakab, Esq.**

Board Certified Civil Trial Lawyer  
Florida Supreme Court Certified Circuit Mediator  
Jakab Law, PLLC  
6277 Dupont Station Ct, Suite 3

Jacksonville, FL 32217  
904-683-2290 (p)  
904-683-7588 (f)  
Email: [kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)  
Website: [www.JakabLaw.com](http://www.JakabLaw.com)

**From:** Jack Webb <[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)>  
**Sent:** Friday, January 23, 2026 1:02 PM  
**To:** Richard Maselli <[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)>  
**Cc:** Kevin Jakab <[kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)>; Lisa Reagor <[LReagor@jakablaw.com](mailto:LReagor@jakablaw.com)>; Alexis Richey <[arichey@jackwebblaw.com](mailto:arichey@jackwebblaw.com)>; Jill Upton <[jupton@jackwebblaw.com](mailto:jupton@jackwebblaw.com)>; Dawnye'l Mauck <[DMAuck@ogdensullivan.com](mailto:DMAuck@ogdensullivan.com)>  
**Subject:** Re: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001: Byrd, Bradley v. Costco and RXO--Costco's discovery responses and MPO-CA, 1-14-26

Thinking about 3rd week in February for depositions. Let me know your thoughts?

John D. "Jack" Webb, Esq.

John D. Webb, P.A.

1662 Stockton Street, Suite 201

Jacksonville, Florida 32204

(904) 803-4686

[www.jackwebblaw.com](http://www.jackwebblaw.com)

\*\*\*This is a transmission from the law firm of John D. Webb, P.A. and may contain information which is privileged, confidential, and protected by the attorney-client or attorney work product privileges. If you are not the addressee or intended recipient, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this transmission in error, please destroy it and notify us immediately at our telephone number (904) 803-4686.\*\*\*

On Jan 21, 2026, at 11:30 AM, Richard Maselli <[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)> wrote:

Jack,

We've been asking for depo dates for your clients for a while and now we are waiting on discovery responses. Obviously we want to work with you on these type of matters but we also need to move forward. Please advise on your clients' availability for deposition and provide a status of discovery by 5pm on Friday, 1/23 or we will need to file a MTC.

Thanks,

Rich

**Richard S. Maselli, Esquire**

<image001.png>

Ogden Sullivan Stover & Saar, P.A.

5422 Bay Center Dr., Suite 100, Tampa, FL 33609

O: 813.223.5111 | F: 813.229.2336

D: 813.262.2052 | C: 727.743.5006

# **EXHIBIT F**

---

**From:** Kevin Jakab  
**Sent:** Thursday, January 29, 2026 11:54 AM  
**To:** Jack Webb  
**Cc:** Richard Maselli; Lisa Reagor; Alexis Richey; Dawnye'l Mauck; Deirdre Connolly  
**Subject:** Byrd, Bradley v. Costco and RXO Last Mile --final GF correspondence, Ps' dep. timeslots, 1-29-26

Jack:

1. Ps' depositions—the discovery matters you raise below, do not preclude scheduling Ps' depositions. We are not letting another deadline pass. We will draft the motion to compel today and have it ready to file if we do not have timeslots for Plaintiffs' depositions by 5:00 p.m. tomorrow, 1/30/26. **We have been more than patient regarding these depositions.**
2. Regarding the discovery matters you raise below, all are non-issues.
  - a. If you object to Costco's NPNP, let us know. No delay is warranted. At this point, we have sent the subpoenas associated with the NPNP on two (2) occasions (1/28/26, and again today, 1/29/26). As result, P is on notice of the subpoenas and their content. The NPNP is not defective because we will wait ten (10) days from the date we forwarded the subpoenas, which was yesterday (1/28/26), to send them out. **Again, if you object to the issuance of the two (2) subpoenas, please advise on or before 2/9/26, and we will have that called up for hearing, asap, as well.**
  - b. The protective order is a non-issue and does not prevent or slow discovery, in any way.
3. We do not agree that a whole week needs to be blocked off for depositions in this case before receiving timeslots for Plaintiffs' depositions. That is further strategy to delay this case. We will take Plaintiffs' depositions during the timeslots you provide for the third (3<sup>rd</sup>) week of February—the week you selected—and any other depositions will follow Plaintiffs' depositions, upon request. To date, Plaintiff has not requested any depositions...

Again, we will need the timeslots for Plaintiffs' depositions by **5:00 p.m. tomorrow, 1/30/26.**

**Kevin Jakab, Esq.**

Board Certified Civil Trial Lawyer  
Florida Supreme Court Certified Circuit Mediator  
Jakab Law, PLLC  
6277 Dupont Station Ct, Suite 3  
Jacksonville, FL 32217  
904-683-2290 (p)  
904-683-7588 (f)  
Email: [kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)  
Website: [www.JakabLaw.com](http://www.JakabLaw.com)

**From:** Jack Webb <jwebb@jackwebblaw.com>  
**Sent:** Thursday, January 29, 2026 11:21 AM

To: Kevin Jakab <kjakab@jakablaw.com>

Cc: Richard Maselli <RMaselli@ogdensullivan.com>; Lisa Reagor <LReagor@jakablaw.com>; Alexis Richey <arichey@jackwebblaw.com>; Dawnye'l Mauck <DMAuck@ogdensullivan.com>; Deirdre Connolly <dconnolly@jackwebblaw.com>

Subject: Re: Byrd, Bradley v. Costco and RXO Last Mile --final GF correspondence, Ps' dep. timeslots, 1-29-26

It seems to me to make sense to block off a full week for depositions on all sides. At this point we still have not received documents and we are messing around with an unacceptable proposed protective order and a defective notice of intent to serve a third-party subpoena. That said, I will get back with you as soon as I am able, most likely Saturday as I have a filing deadline in the 5th DCS tomorrow.

John D. "Jack" Webb, Esq.

John D. Webb, P.A.

1662 Stockton Street, Suite 201

Jacksonville, Florida 32204

(904) 803-4686

[www.jackwebblaw.com](http://www.jackwebblaw.com)

\*\*\*This is a transmission from the law firm of John D. Webb, P.A. and may contain information which is privileged, confidential, and protected by the attorney-client or attorney work product privileges. If you are not the addressee or intended recipient, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this transmission in error, please destroy it and notify us immediately at our telephone number (904) 803-4686.\*\*\*

On Jan 29, 2026, at 11:06 AM, Kevin Jakab <[kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)> wrote:

Jack:

Good morning.

Please accept this as our final good faith attempt to get timeslots for Plaintiffs' depositions. We have been requesting these since early December.

If we do not get timeslots before close of business (**5:00 p.m.**) **tomorrow, Friday, 1/30/26**, we will move to compel these depositions and request a short hearing, asap.

Thank you for your time and attention to this matter.

**Kevin Jakab, Esq.**

Board Certified Civil Trial Lawyer

Florida Supreme Court Certified Circuit Mediator

**Jakab Law, PLLC**

6277 Dupont Station Ct, Suite 3

Jacksonville, FL 32217

904-683-2290 (p)

904-683-7588 (f)

Email: [kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)

Website: [www.JakabLaw.com](http://www.JakabLaw.com)

**From:** Kevin Jakab <[kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)>  
**Sent:** Wednesday, January 28, 2026 2:00 PM  
**To:** Jack Webb <[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)>  
**Cc:** Richard Maselli <[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)>; Lisa Reagor <[LReagor@jakablaw.com](mailto:LReagor@jakablaw.com)>; Alexis Richey <[arichey@jackwebblaw.com](mailto:arichey@jackwebblaw.com)>; Dawnye'l Mauck <[DMauck@ogdensullivan.com](mailto:DMauck@ogdensullivan.com)>; Deirdre Connolly <[dconnolly@jackwebblaw.com](mailto:dconnolly@jackwebblaw.com)>  
**Subject:** RE: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001: Byrd, Bradley v. Costco and RXO--Costco's discovery responses and MPO-CA, 1-14-26

Here are the subs., attached.

### **Kevin Jakab, Esq.**

Board Certified Civil Trial Lawyer  
Florida Supreme Court Certified Circuit Mediator  
**Jakab Law, PLLC**  
6277 Dupont Station Ct, Suite 3  
Jacksonville, FL 32217  
904-683-2290 (p)  
904-683-7588 (f)  
Email: [kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)  
Website: [www.JakabLaw.com](http://www.JakabLaw.com)

**From:** Jack Webb <[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)>  
**Sent:** Wednesday, January 28, 2026 1:49 PM  
**To:** Kevin Jakab <[kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)>  
**Cc:** Richard Maselli <[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)>; Lisa Reagor <[LReagor@jakablaw.com](mailto:LReagor@jakablaw.com)>; Alexis Richey <[arichey@jackwebblaw.com](mailto:arichey@jackwebblaw.com)>; Dawnye'l Mauck <[DMauck@ogdensullivan.com](mailto:DMauck@ogdensullivan.com)>; Deirdre Connolly <[dconnolly@jackwebblaw.com](mailto:dconnolly@jackwebblaw.com)>  
**Subject:** Re: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001: Byrd, Bradley v. Costco and RXO--Costco's discovery responses and MPO-CA, 1-14-26

I don't see the draft subpoena attached.

John D. "Jack" Webb, Esq.

John D. Webb, P.A.

1662 Stockton Street, Suite 201

Jacksonville, Florida 32204

(904) 803-4686

[www.jackwebblaw.com](http://www.jackwebblaw.com)

\*\*\*This is a transmission from the law firm of John D. Webb, P.A. and may contain information which is privileged, confidential, and protected by the attorney-client or attorney work product privileges. If you are not the addressee or intended recipient, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this transmission in error, please destroy it and notify us immediately at our telephone number (904) 803-4686.\*\*\*

On Jan 28, 2026, at 1:40 PM, Kevin Jakab <[kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)> wrote:

Jack:

See below, at bottom. NPNP served on 1/22/26.

**Kevin Jakab, Esq.**

Board Certified Civil Trial Lawyer  
Florida Supreme Court Certified Circuit Mediator

**Jakab Law, PLLC**

6277 Dupont Station Ct, Suite 3

Jacksonville, FL 32217

904-683-2290 (p)

904-683-7588 (f)

Email: [kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)

Website: [www.JakabLaw.com](http://www.JakabLaw.com)

**From:** Jack Webb <[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)>

**Sent:** Wednesday, January 28, 2026 1:07 PM

**To:** Kevin Jakab <[kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)>

**Cc:** Richard Maselli <[RMaselli@ogdensullivan.com](mailto:RMaselli@ogdensullivan.com)>; Lisa Reagor <[LReagor@jakablaw.com](mailto:LReagor@jakablaw.com)>; Alexis Richey <[arichey@jackwebblaw.com](mailto:arichey@jackwebblaw.com)>; Dawnye'l Mauck <[DMAuck@ogdensullivan.com](mailto:DMAuck@ogdensullivan.com)>; Deirdre Connolly <[dconnolly@jackwebblaw.com](mailto:dconnolly@jackwebblaw.com)>

**Subject:** Re: Byrd, Bradley v. Costco and RXO Last Mile Sedgwick Claim #4A24128QY52-0001: Byrd, Bradley v. Costco and RXO--Costco's discovery responses and MPO-CA, 1-14-26

Did you serve a notice of intent to issue a third party subpoena? My client says you have but I have not received anything.

John D. "Jack" Webb, Esq.

John D. Webb, P.A.

1662 Stockton Street, Suite 201

Jacksonville, Florida 32204

(904) 803-4686

[www.jackwebblaw.com](http://www.jackwebblaw.com)

On Jan 28, 2026, at 9:26 AM, Kevin Jakab <[kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)> wrote:

Jack:

Did your office forward timeslots for the depositions in this case for third (3<sup>rd</sup>) week of February? We would like to get these noticed.

1. Brad Byrd—full day
2. Anna Byrd—half day.

Also, please forward their driver's licenses, front & back. They were referenced in the RTP but not forwarded. We can get their SS #s via a phone call.

Ty, kj.

**Kevin Jakab, Esq.**

Board Certified Civil Trial Lawyer  
Florida Supreme Court Certified Circuit Mediator

**Jakab Law, PLLC**

6277 Dupont Station Ct, Suite 3

Jacksonville, FL 32217

904-683-2290 (p)

904-683-7588 (f)

Email: [kjakab@jakablaw.com](mailto:kjakab@jakablaw.com)

Website: [www.JakabLaw.com](http://www.JakabLaw.com)