



James Jones <jamesjonespha@gmail.com>

RE: PRE-TRIAL STIPULATION, JURY INSTRUCTIONS AND J. MITCHELL INVESTMENT PROPERETIES

Nathaniel Green <nate@nategreenpa.com>

Fri, Jan 10, 2025 at 2:54 PM

To: James Jones <jamesjonespha@gmail.com>

Cc: Pat Green <pat@nategreenpa.com>, Somantia Harris <somantia@nategreenpa.com>

Mr. Jones

We may need to speak on the jury instructions. We do find yours. The ones we sent you were mostly preliminaries before we get into the substantive claims. We do not find yours in the court file either.

If you plan to present all 20 plus counts to the jury, then we continue to work up a full set. If plan to withdraw any, it should be done soon either in the pretrial or by separate filing.

On the issue of the lien, your compliance with Section 713.18(2)(b) must be proven in order to avail yourself to 713.18((1)(b) for posting onsite. Even if allowed, it would violate basis rights of due process which must be calculated to give reasonable and fair notice.

The City called a few minutes ago and want to know if we can agree to do a short depo of its witness to avoid her appearing under our trial subpoena. I indicated I would ask you; however, I do not believe we have time, unless we are not reached. With the King Holiday on the 19th and my unavailability which actually should have been the 30th and 31st, we may not get reached on this docket but we cannot count on that.

In summary, I am still not at full strength with some residual symptoms but can work on a joint pre-trial over the weekend to have something to file by Monday, in case we are reached.

Regards,
N. E. Green

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From: James Jones <jamesjonespha@gmail.com>**Sent:** Wednesday, January 8, 2025 5:16:58 PM**To:** Nathaniel Green <nate@nategreenpa.com>**Cc:** Pat Green <pat@nategreenpa.com>; Somantia Harris <somantia@nategreenpa.com>**Subject:** Re: PRE-TRIAL STIPULATION, JURY INSTRUCTIONS AND J. MITCHELL INVESTMENT PROPERETIES

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