

# Exhibit G

**From:** [Brown, Laura J.S. \(ENRD\)](#)  
**To:** [lkogan@koganlawgroup.com](mailto:lkogan@koganlawgroup.com); [Devlin, Neal](#)  
**Cc:** [Cox, Alexander K.](#); [Uholik, Brian \(ENRD\)](#); [Kolman, Chloe \(ENRD\)](#); [Buckley, Sarah \(ENRD\)](#)  
**Subject:** RE: Re: Brace - Deposition Notices  
**Date:** Friday, October 13, 2017 2:09:51 PM

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Sorry, I left Peter Stokely off the list below.

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**From:** Brown, Laura J.S. (ENRD)  
**Sent:** Friday, October 13, 2017 2:03 PM  
**To:** 'lkogan@koganlawgroup.com' <lkogan@koganlawgroup.com>; Devlin, Neal <ndevlin@kmgslaw.com>  
**Cc:** Cox, Alexander K. <acox@kmgslaw.com>; Uholik, Brian (ENRD) <BUholik@ENRD.USDOJ.GOV>; Kolman, Chloe (ENRD) <CKolman@ENRD.USDOJ.GOV>; Buckley, Sarah (ENRD) <SBuckley@ENRD.USDOJ.GOV>  
**Subject:** RE: Re: Brace - Deposition Notices

Hi Larry:

Yes, there will be a lunch break and the finish time will be 5:30 pm on Monday, and I expect we'll be able to wrap up earlier on Tuesday afternoon.

Attendees are as follows:

Brian Uholik  
Sarah Buckley  
Katelyn Almeter  
Robert Brooks  
Dwayne Edwards  
Heather Edwards

Laura

**From:** [lkogan@koganlawgroup.com](mailto:lkogan@koganlawgroup.com) [<mailto:lkogan@koganlawgroup.com>]  
**Sent:** Friday, October 13, 2017 12:49 PM  
**To:** Devlin, Neal <[ndevlin@kmgslaw.com](mailto:ndevlin@kmgslaw.com)>; Brown, Laura J.S. (ENRD) <[LBrown@ENRD.USDOJ.GOV](mailto:LBrown@ENRD.USDOJ.GOV)>  
**Cc:** Cox, Alexander K. <[acox@kmgslaw.com](mailto:acox@kmgslaw.com)>; Uholik, Brian (ENRD) <[BUholik@ENRD.USDOJ.GOV](mailto:BUholik@ENRD.USDOJ.GOV)>; Kolman, Chloe (ENRD) <[CKolman@ENRD.USDOJ.GOV](mailto:CKolman@ENRD.USDOJ.GOV)>; Buckley, Sarah (ENRD) <[SBuckley@ENRD.USDOJ.GOV](mailto:SBuckley@ENRD.USDOJ.GOV)>  
**Subject:** RE: Re: Brace - Deposition Notices

Laura,

Please also confirm finish times for each day (assuming a second day is needed at all).

Will there be an hour lunch break?

I don't recall whether or not you previously confirmed who will be in attendance conducting,

recording and/or observing the inspections.

If not, please do; if yes, please resend that information.

Thank you,

Larry

----- Original Message -----

Subject: Re: Brace - Deposition Notices

From: "Devlin, Neal" <[ndevlin@kmgslaw.com](mailto:ndevlin@kmgslaw.com)>

Date: 10/13/17 12:39 pm

To: "Brown, Laura J.S. (ENRD)" <[Laura.J.S.Brown@usdoj.gov](mailto:Laura.J.S.Brown@usdoj.gov)>

Cc: "Cox, Alexander K." <[acox@kmgslaw.com](mailto:acox@kmgslaw.com)>, "[lkogan@koganlawgroup.com](mailto:lkogan@koganlawgroup.com)" <[lkogan@koganlawgroup.com](mailto:lkogan@koganlawgroup.com)>, "Uholik, Brian (ENRD)" <[Brian.Uholik@usdoj.gov](mailto:Brian.Uholik@usdoj.gov)>, "Kolman, Chloe (ENRD)" <[Chloe.Kolman@usdoj.gov](mailto:Chloe.Kolman@usdoj.gov)>, "Buckley, Sarah (ENRD)" <[Sarah.Buckley@usdoj.gov](mailto:Sarah.Buckley@usdoj.gov)>

Laura

Can you confirm the start times for the inspections on Monday and Tuesday?

Neal

Sent from my iPhone

On Oct 12, 2017, at 4:33 PM, Brown, Laura J.S. (ENRD) <[Laura.J.S.Brown@usdoj.gov](mailto:Laura.J.S.Brown@usdoj.gov)> wrote:

Neal and Larry:

Attached are deposition notices for the following witnesses.

- Robert Brace,
- Randall Brace,
- Ronald Brace,
- Beverly Brace,
- Rhonda McAtee,
- Brace Farms Inc. (by corporate designee(s)), and
- Brace & Sons Inc. (by corporate designee(s))

There are two deposition notices for each deponent, one for each caption. However, you will see that for each witness, the location and time of the

deposition in both notices is the same, as we only plan to depose each witness once (but for clerical purposes wanted separate notices for each caption).

I've noticed the Rule 30(b)(6) depositions of Brace Farms and Brace & Sons for 11/15/17. However, to the extent the designees will be Robert, Randall, Ronald, Beverly and/or Rhonda, we think it is easiest to combine the 30(b)(6) with their personal depositions. Please let me know who the designees will be (and for which topics) so we can plan accordingly.

Laura J. Brown  
Trial Attorney  
Environmental Defense Section  
Environment & Natural Resources Division  
U.S. Department of Justice  
(202) 514-3376

<ENV\_DEFENSE-#821763-v1-Brace\_-\_Notice\_of\_Deposition\_-\_Beverly\_Brace\_-\_17\_action\_.pdf>

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