

EXHIBIT A

Serli Polatoglu

From: Tamar Lusztig <TLusztig@susmangodfrey.com>
Sent: Tuesday, May 26, 2020 7:20 AM
To: Kasaraneni, Karthik; Dennis S. Ellis; PH-UMASS v. L'Oreal USDC; Dittmann, Eric W.; Frederick Cottrell; Ashkenazi, Isaac S.; Jason Rawnsley; Jeffrey Moyer; Palys, Joseph E.; Katharine Mowery; Katherine F. Murray; Modi, Naveen; Tymoczko, Nicholas; Serli Polatoglu
Cc: Beatrice Franklin; Bill Carmody; Brian Farnan; Davida Brook; Justin A. Nelson; Keeley Lombardo; Lucas I. Silva; Matthew Lowrie; Michael J. Farnan ; Rodney Polanco
Subject: RE: UMass v. L'Oreal: Depositions

Karthik,

We have a slight modification to make to the 30(b)(6) designations for next week.

Subject to our written objections and our subsequent email exchange regarding scope, the following witnesses will testify about the following topics:

Dr. McNamara: 7, 9, 11, 12, 13, 14, 15, 16, 20, 22, 26, 30, 33, 36, 37

Dr. Dobson: 8, 23, 24, 25, 27, 28, 29, 30, 31, 32, 34, 35, 36, 38

Mr. Wyrzykowski: 2, 10, 12, 13, 14, 15, 36

Mr. Menard: 1, 3, 4, 5, 6, 17, 18, 19, 20, 21, 22, 37

Thanks.

-Tamar

From: Tamar Lusztig
Sent: Monday, May 18, 2020 7:26 PM
To: Kasaraneni, Karthik <karthikkasaraneni@paulhastings.com>; Dennis Ellis <dellis@bgrfirm.com>; PH-UMASS v. L'Oreal USDC <PH-UMass-LOreal-USDC@paulhastings.com>; Dittmann, Eric W. <ericdittmann@paulhastings.com>; Frederick Cottrell <cottrell@rlf.com>; Ashkenazi, Isaac S. <isaacashkenazi@paulhastings.com>; Jason Rawnsley <rawnsley@rlf.com>; Jeffrey Moyer <moyer@rlf.com>; Palys, Joseph E. <josephpalys@paulhastings.com>; Katharine Mowery <mowery@rlf.com>; Katherine Murray <kmurray@bgrfirm.com>; Modi, Naveen <naveenmodi@paulhastings.com>; Tymoczko, Nicholas <nicholastymoczko@paulhastings.com>; Serli Polatoglu <spolatoglu@bgrfirm.com>
Cc: Beatrice Franklin <BFranklin@susmangodfrey.com>; Bill Carmody <bcarmody@SusmanGodfrey.com>; Brian Farnan <bfarnan@farnanlaw.com>; Davida Brook <DBrook@susmangodfrey.com>; Justin A. Nelson <jnelson@SusmanGodfrey.com>; Keeley Lombardo <klombardo@susmangodfrey.com>; Lucas I. Silva <lsilva@foley.com>; Matthew Lowrie <mlowrie@foley.com>; Michael J. Farnan <mfarnan@farnanlaw.com>; Rodney Polanco <RPolanco@susmangodfrey.com>
Subject: RE: UMass v. L'Oreal: Depositions

Karthik,

Dr. Michael Ethier will be available for his deposition on 6/2.

Subject to our written objections and our subsequent email exchange regarding scope, the following witnesses will testify about the following topics:

Dr. McNamara: 7, 9, 11, 12, 13, 14, 15, 16, 20, 22, 26, 30, 33, 36, 37

Dr. Dobson: 8, 23, 24, 25, 27, 28, 29, 30, 31, 32, 34, 35, 36, 38

Mr. Wyrzykowski: 1, 2, 3, 4, 5, 6, 10, 12, 13, 14, 15, 17, 18, 19, 20, 21, 22, 36, 37

Could you please let us know by close of business tomorrow whether you intend to proceed with the Steinman, Warshawsky, or Decker depositions so that we can get them scheduled, or not, as the case may be? And similarly, can you please let us know by close of business tomorrow whether you plan to use a half day or less for any of the witnesses we will be presenting for deposition?

Thanks!

-Tamar

From: Kasaraneni, Karthik <karthikkasaraneni@paulhastings.com>

Sent: Monday, May 18, 2020 6:14 PM

To: Tamar Lusztig <TLusztig@susmangodfrey.com>; Dennis Ellis <dellis@bgrfirm.com>; PH-UMASS v. L'Oreal USDC <PH-UMass-LOreal-USDC@paulhastings.com>; Dittmann, Eric W. <ericdittmann@paulhastings.com>; Frederick Cottrell <cottrell@rlf.com>; Ashkenazi, Isaac S. <isaacashkenazi@paulhastings.com>; Jason Rawnsley <rawnsley@rlf.com>; Jeffrey Moyer <moyer@rlf.com>; Palys, Joseph E. <josephpalys@paulhastings.com>; Katharine Mowery <mowery@rlf.com>; Katherine Murray <kmurray@bgrfirm.com>; Modi, Naveen <naveenmodi@paulhastings.com>; Tymoczko, Nicholas <nicholastymoczko@paulhastings.com>; Serli Polatoglu <spolatoglu@bgrfirm.com>

Cc: Beatrice Franklin <BFranklin@susmangodfrey.com>; Bill Carmody <bcarmody@SusmanGodfrey.com>; Brian Farnan <bfarnan@farnanlaw.com>; Davida Brook <DBrook@susmangodfrey.com>; Justin A. Nelson <jnelson@SusmanGodfrey.com>; Keeley Lombardo <KLombardo@susmangodfrey.com>; Lucas I. Silva <lsilva@foley.com>; Matthew Lowrie <mlowrie@foley.com>; Michael J. Farnan <mfarnan@farnanlaw.com>; Rodney Polanco <RPolanco@susmangodfrey.com>

Subject: RE: UMass v. L'Oreal: Depositions

Tamar,

Thank you for providing these dates. We are checking to see if they work for us. Please let us know which of these witnesses, if any, you will be designating as 30(b)(6) witnesses, and for which topics. Please also provide proposed deposition dates for the remaining witnesses.

Thank you,
Karthik

From: Tamar Lusztig <TLusztig@susmangodfrey.com>

Sent: Saturday, May 16, 2020 9:37 PM

To: Dennis Ellis <dellis@bgrfirm.com>; PH-UMASS v. L'Oreal USDC <PH-UMass-LOreal-USDC@paulhastings.com>; Dittmann, Eric W. <ericdittmann@paulhastings.com>; Frederick Cottrell <cottrell@rlf.com>; Ashkenazi, Isaac S. <isaacashkenazi@paulhastings.com>; Jason Rawnsley <rawnsley@rlf.com>; Jeffrey Moyer <moyer@rlf.com>; Palys, Joseph E. <josephpalys@paulhastings.com>; Katharine Mowery <mowery@rlf.com>; Katherine Murray <kmurray@bgrfirm.com>; Modi, Naveen <naveenmodi@paulhastings.com>; Tymoczko, Nicholas <nicholastymoczko@paulhastings.com>; Serli Polatoglu <spolatoglu@bgrfirm.com>

Cc: Beatrice Franklin <BFranklin@susmangodfrey.com>; Bill Carmody <bcarmody@SusmanGodfrey.com>; Brian Farnan <bfarnan@farnanlaw.com>; Davida Brook <DBrook@susmangodfrey.com>; Justin A. Nelson <jnelson@SusmanGodfrey.com>; Keeley Lombardo <KLombardo@susmangodfrey.com>; Lucas I. Silva <lsilva@foley.com>; Matthew Lowrie <mlowrie@foley.com>; Michael J. Farnan <mfarnan@farnanlaw.com>; Rodney

Polanco <RPolanco@susmangodfrey.com>; Tamar Lusztig <TLusztig@susmangodfrey.com>

Subject: [EXT] UMass v. L'Oreal: Depositions

Counsel,

We are still confirming a few dates, but did not want to delay in getting you the below information. The following witnesses will be available for remote video depositions on the following dates:

Dr. Jim McNamara: 5/27
Dr. James Dobson: 5/27
Dr. Satinder Rawat: 5/29
Dr. Kevin Lehman: 6/1
Renato Jose: 6/1
Frank Gallagher: 6/2
Paul Menard: 6/4
Dennis Wyrzykowski 6/5

For now, the depositions will begin at 10 AM in the deponent's home time zone; though we reiterate our earlier request to let us know if any of the depositions will be going less than half a day in which case we may adjust.

-Tamar

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EXHIBIT B

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