

EXHIBIT 2

From: Smith, Nicole M. <nmsmith@jonesday.com>
Sent: Friday, May 14, 2021 1:50 PM
To: Koh, Jennifer (SD)
Cc: #C-M PMIEDVA - LW TEAM; RJREDVA
Subject: RE: Kodama deposition

Hi Jennifer,

I did indeed miss your voicemail. Mr. Kodama has already moved around his schedule to accommodate Monday's deposition. We confirmed Mr. Kodama's availability for May 10 a full month ago, on April 13. Mr. Kodama kept May 10 open only to have it canceled at the last minute, and pushed another full week to May 17. Defendants need to proceed with this long-scheduled deposition on Monday; they have had ample time to prepare and accommodate the unavailability of one of their own attorneys. Mr. Kodama will appear on Monday. If you choose not to take his deposition, we will not be making him available again.

-Nicole

Nicole Smith (bio)
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From: Jennifer.Koh@lw.com <Jennifer.Koh@lw.com>
Sent: Friday, May 14, 2021 9:10 AM
To: Smith, Nicole M. <nmsmith@jonesday.com>
Subject: Kodama deposition

**** External mail ****

Hi Nicole,

Good morning, just wanted to follow up on my voice mail to you yesterday (in the event you didn't receive it). We understand Mr. Kodama is not available any other days the week of the 17th and were wondering if he was available for deposition the week of the 24th. I understand you might not have an alternate date from him yet but just wanted to make sure that we can agree that the deposition will not go forward on the 17th. Thanks again for your and Mr. Kodama's understanding and flexibility here. I'm at 858-523-3949 if needed.

Thanks,
Jennifer

Jennifer Koh

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