

**From:** Billy Broussard <billy@billybroussard.com>  
**Sent:** Tuesday, December 6, 2022 7:59 AM  
**To:** Eric Haik  
**Cc:** Elaina Champagne; Ali LeBlanc; gannonjwattscounseling@gmail.com; Michael Caffery; Robert Burns  
**Subject:** Re: Scheduling Depositions of Julie and Gannon Watts Regarding Billy Broussard v. Mendy Girouard and Melissa Dubroc Docket # 92077, Division "H"

Mr. Haik:

Regarding your reply back to me entailing the depositions of Dr. Gannon Watts and his wife, Julie Watts:

1. I copied ADA Michael Caffery, which I am doing once again with this email, as a courtesy.
2. In order to ensure everyone is operating with full transparency and ease of coordination, I am also copying Dr. Watts.
3. I know that you did not agree regarding the date of January 12, 2023 at 10:00 a.m. entailing Dr. Watts' and Ms. Watts' deposition. As I indicated, the Clerk of Court letter was a draft subject to revision upon us nailing down the finalized dates and time.
4. I am open on dates, so I'll ask that you provide dates which work after January 12, 2023. All I ask is that the deposition transpire in the morning rather than the afternoon because I am often checking on jobs I have running in afternoons, so mornings work much better for me.
5. So you can hit "reply to all" with a date after January 12, 2023 on any weekday morning, and I will mark it on my calendar. By including Dr. Watts on this email, we can assure that the date for the depositions work well for both him and his wife as well.

Thank you, and I look forward to hearing back from you and us finalizing a date and time for these two depositions.

Sent from my iPhone

On Dec 4, 2022, at 2:07 PM, Eric Haik <ehaik@hmg-law.com> wrote:

Mr. Broussard

Why did you copy ADA Michael Caffery on your email? Also, I never agreed to 1/12 depositions and am not available. I have prior scheduling conflicts on that date. Send us some dates so we can coordinate same.

**Eric T. Haik**

<image002.jpg>

# HAIK MINVIELLE, GRUBBS, & D'ALBOR, LLP

## Attorneys at Law

### Main Office:

1017 E Dale Street  
P. O. Box 11040  
New Iberia, LA 70562-1040  
P (337) 365-5486  
F (337) 367-7069  
Website: [hmg-law.com](http://hmg-law.com)  
Email: [ehaik@hmg-law.com](mailto:ehaik@hmg-law.com)

### New Orleans Satellite Office:

201 St. Charles Avenue, Suite 2500  
New Orleans, LA 70170  
P (504) 754-6966  
F (504-524-7979

---

*CONFIDENTIALITY NOTICE: The email transmission (and/or attachments accompanying it) may contain confidential information belonging to the sender which is protected by the Attorney/Client Privilege. The information is intended only for the use of the recipient named above. If you have received the email in error, please notify us immediately by telephone (337-365-5486 or 1-800-491-9853). You are cautioned that any disclosure, copying, distribution or other use of the transmitted information is strictly prohibited.*

---

**From:** Billy Broussard <[billy@billybroussard.com](mailto:billy@billybroussard.com)>

**Sent:** Friday, December 2, 2022 6:10 PM

**To:** Eric Haik <[ehaik@hmg-law.com](mailto:ehaik@hmg-law.com)>

**Cc:** Michael Caffery <[mcaffery@16jda.com](mailto:mcaffery@16jda.com)>; Elaina Champagne <[echampagne@hmg-law.com](mailto:echampagne@hmg-law.com)>

**Subject:** Scheduling Depositions of Julie and Gannon Watts Regarding Billy Broussard v. Mendy Girouard and Melissa Dubroc Docket # 92077, Division "H"

Mr. Haik:

Please see the attached letter to the St. Martin Parish Clerk of Court which I intend to hand deliver either Monday or Tuesday of next week. It entails taking the depositions of two residents on Duchamp Road who are also identified on the petition provided to the St. Martin Parish Council on March 2, 2022 identified as "signatories" 53.

The date and time of the deposition is flexible, so please let me know if Thursday, January 12, 2023 at 10:00 a.m. is a conflict for you. If so, we can schedule a different time and/or date to facilitate the deposition.

Please also be advised that I have informed the court reporter, Lori Heaphy & Associates, that I intend to deploy their videography service. I am informing you as well that my plan is to videotape any and all depositions which become necessary as we progress through discovery.

Thank you for your attention to this matter, and I look forward to seeing you in court on Friday, December 9, 2022 at 9:00 a.m., at which time I understand we will be arguing both your Peremptory Exception as well as my Motion to Compel.

Sent from my iPhone