

EXHIBIT A

From: Buck Dougherty <BDougherty@duncanhatcher.com>
Sent: Wednesday, August 4, 2021 8:18 AM
To: Thompson, Overton III <OThompson@bassberry.com>
Subject: RE: Mahoney v. Facebook

Overton,

My position remains the same. Absent a stipulation that venue remains in U.S.M.D. TN upon removal, I can't agree to an extension to respond, be it 19 or 30 days.

Regards, Buck

From: Thompson, Overton III <OThompson@bassberry.com>
Sent: Tuesday, August 3, 2021 3:37 PM
To: Buck Dougherty <BDougherty@duncanhatcher.com>
Subject: RE: Mahoney v. Facebook

Buck, I am following up on our extension request. My point below is that the Court will not require us to waive our rights simply to obtain an extension. Also, I respectfully disagree that there is anything unusual about asking for a 30 day extension to respond to a Complaint after removal.

Nevertheless, we intend to file a motion with the Court seeking a 19 day extension. Please advise whether you are agreeable to that shortened time period. Thanks.

Regards,
Overton

Overton Thompson

Member

Bass, Berry & Sims PLC

150 Third Avenue South, Suite 2800 • Nashville, TN 37201

(615)-742-7730 phone • 615-742-6293 fax

OThompson@bassberry.com • www.bassberry.com

From: Buck Dougherty <BDougherty@duncanhatcher.com>

Sent: Tuesday, July 27, 2021 3:39 PM

To: Thompson, Overton III <OThompson@bassberry.com>

Subject: RE: Mahoney v. Facebook

Overton,

Parties may consent to venue as those matters are routinely agreed to contractually all the time as I'm sure you're aware so I do not understand your statement that the court would "not impose" that.

And while a courtesy extension is typically agreed to and normally I would not have an issue with that, it is not typical following a notice of removal from state court to federal court, and I would not classify as "a routine extension" a motion requesting an additional 30 days to respond to a complaint following removal from state court to federal court.

So I am not willing to agree to the requested extension absent an agreed stipulation that venue remain in the middle district of TN throughout the pendency of this case.

Regards, Buck

From: Thompson, Overton III <OThompson@bassberry.com>

Sent: Tuesday, July 27, 2021 4:19 PM

To: Buck Dougherty <BDougherty@duncanhatcher.com>

Subject: RE: Mahoney v. Facebook

Buck, we are not in a position to waive our rights simply to obtain a routine extension. The Court will obviously not impose that condition. Please let us know if you are willing to agree to the requested extension. If not, we are prepared to file a motion with the Court.

I look forward to hearing from you. Thanks.

Regards,
Overton

Overton Thompson

Member

Bass, Berry & Sims PLC

150 Third Avenue South, Suite 2800 • Nashville, TN 37201

(615)-742-7730 phone • 615-742-6293 fax

OThompson@bassberry.com • www.bassberry.com

From: Buck Dougherty <BDougherty@duncanhatcher.com>
Sent: Tuesday, July 27, 2021 9:35 AM
To: Thompson, Overton III <OThompson@bassberry.com>
Subject: RE: Mahoney v. Facebook

Overton,

Nice talking to you on Friday and confirming your representation of Facebook.

Regarding your request for an extra 30 days from your notice of removal to the U.S. District Court in the Middle District of TN to respond to the Complaint (until August 30), are you agreeable to entering a stipulation that Facebook consents to venue in the Middle District of TN for the duration of the case?

Thanks. I look forward to working with you as well.

Regards, Buck



M. E. Buck Dougherty III, Attorney
Duncan, Hatcher, Holland & Fleenor, P.C.
1418 McCallie Avenue
Chattanooga, TN 37404
423-266-2207 x 127
423-326-7548-mobile
423-265-8907 (fax)
<http://www.duncanhatcher.com>

CONFIDENTIALITY NOTICE: This electronic message transmission contains information from Duncan, Hatcher, Holland & Fleenor, PC which may be confidential or privileged. The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited. If you have received this electronic transmission in error, please notify us by telephone (423) 266-2207 or electronic mail (bdougherty@duncanhatcher.com) immediately.

From: Thompson, Overton III <OThompson@bassberry.com>
Sent: Friday, July 23, 2021 2:38 PM
To: Buck Dougherty <BDougherty@duncanhatcher.com>
Subject: Mahoney v. Facebook

Buck, thanks for talking with me. This will confirm we will be representing Facebook in the above matter and intend to remove the case to federal court. Our right to remove based on diversity grounds seems clear. We would appreciate you allowing us 30 days from removal (until August 30) to respond to the Complaint. Let me know if this is agreeable.

Thanks. I look forward to working with you.

Best,
Overton

Overton Thompson

Member

Bass, Berry & Sims PLC

150 Third Avenue South, Suite 2800 • Nashville, TN 37201

(615)-742-7730 phone • 615-742-6293 fax

OThompson@bassberry.com • www.bassberry.com

This email may contain privileged and confidential information and is meant only for the use of the specific intended addressee(s). Your receipt is not intended to waive any applicable privilege. If you have received this email in error, please delete it and immediately notify the sender by separate email.