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Date: 3/18/2016 9:43:05 AM

Subject: Bilbro--draft affidavit, and filings by other defendants

Attachments: Addison Affidavit (00827921xBE0C9).docx

ECF-10 - Motion to Dismiss (Lutheran Homes) (00830064xBE0C9).pdf

ECF-10-1 Lutheran Homes - Memo Motion to Dismiss (00830063xBE0C9).pdf

ECF#11 - Motion to Dismiss (World Relief) (00830042xBE0C9).pdf

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Holly and Tony, attached are the Motions to Dismiss filed yesterday by the other two defendants in the Bilbro case. In general, my draft summary judgment motion, which is close to being complete, is along the same lines, but will have the added benefit of a supporting affidavit from Dorothy Addison.

A draft version of the affidavit is attached. Much of it is taken from the RRP Backgrounder, with some changes and some rearranging.

Will and I believe it would be helpful if we could meet next week with Ms. Addison (and whoever else would like to attend) in order to finalize the affidavit. I'm pretty open most of the week. If all could advise as to their availability, we can proceed from there to set up the meeting.

I'm not in the office today, but will be checking e-mail regularly.

Thanks,

Ken