

From: Nicole O'Connor <nicole.oconnor@boston.gov>
Sent: Thursday, September 1, 2022 11:06 AM
To: Matt Kezhaya <matt@crown.law>
Cc: robert.arcangeli@boston.gov; Sonia Kezhaya <sonia@crown.law>; Nick Henry <nick@crown.law>; John Hayden <john@crown.law>
Subject: Re: Satanic Temple v. Boston - notices of deposition

Matt:

The City will not produce Mayor Wu for a deposition. There is a protective order in place prohibiting her deposition (ECF 47). The Court underscored that the Satanic Temple may seek discovery from other sources in its denial of the Temple's motion for certificate of appealability (ECF 51). To that end, and as stated in my email dated July 29, 2022, the City's 30(b)(6) designee to testify on Mayor Wu's behalf regarding topics 8, 10, 12, 17, 18, 19, 20, and 21 of Plaintiff's Rule 30(b)(6) deposition subpoena is available on September 12 or 13. September 14 no longer works because of a previously-scheduled City Council meeting.

Please let us know how you plan to proceed. If you move forward with Mayor Wu's deposition, we will file a motion to quash. In the meantime, please do not serve Mayor Wu with any court documents. I will accept service on her behalf. Former Councilor Annissa Essaibi-George is not a City employee and I do not have authority to accept a deposition subpoena on her behalf.

Thanks,

Nicole