

AMERICAN SADDLEBRED
HORSE ASSOCIATION, INC.

PLAINTIFF

v. **MOTION FOR LEAVE TO FILE DEPOSITION TRANSCRIPTS**

EDWARD R. BENNETT, CARL T.
FISCHER, JR., KRIS KNIGHT, TOM
FERREBEE, SIMON FREDRICKS,
M.D. AND LYNN W. VIA

DEFENDANTS

* * * * *

Comes the American Saddlebred Horse Association, Inc. ("ASHA"), by counsel, and moves this Court to tender an Order granting ASHA's motion for leave to file the deposition transcripts and exhibits of the deponents listed below for inclusion in the Certification of Record being prepared by the Clerk of the Fayette Circuit Court in connection with the appeal of *American Saddlebred Horse Association, Inc. v. Edward Bennett, et al.*, pending in the Kentucky Court of Appeals, Case No. 2011-CA-000232-MR.

1. Deposition transcript and exhibits of Carl Holden, taken March 11, 2010.
2. Deposition transcript and exhibits of Joan Jones, taken March 17, 2010.
3. Deposition transcript and exhibits of Jennifer Wasserzug, taken April 8, 2010.

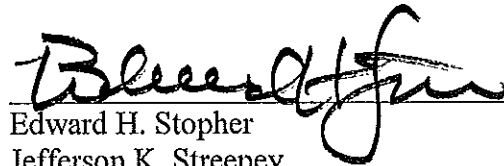
For good cause, ASHA states that these depositions were taken prior to the filing of motions for summary judgment in this Court and were referenced in the briefs filed in support thereof and during the Oral Argument on said motions conducted by this Court on August 25, 2010. Accordingly, ASHA requests this Court provide leave to file the above transcripts and exhibits as part of the record to be transmitted by the clerk of the Fayette Circuit Court to the

Kentucky Court of Appeals for use by the parties and for consideration by the Court of Appeals during the appeal of this matter.

NOTICE

PLEASE TAKE NOTICE that the undersigned will on Friday, June 3, 2011, at 8:30 a.m., local prevailing time, in the courtroom of the above Court, make the following Motion, or as soon thereafter as counsel may be heard.

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and

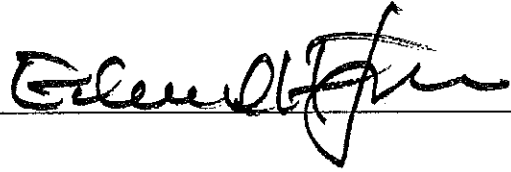
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COUNSEL FOR PLAINTIFF

CERTIFICATE OF SERVICE

It is hereby certified this 27th day of May, 2011, that a copy of the foregoing was served via First Class Mail, postage prepaid, to the following:

Hon. Lewis G. Paisley
Culver V. Halliday
Stephen A. Houston
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A handwritten signature in black ink, appearing to read "Stephen A. Houston", is written over a horizontal line.

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