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EXHIBIT B

Brian A. Laird

From: WEINSTEIN, JANET [jweinstein@fclaw.com]
Sent: Thursday, February 22, 2007 10:51 AM
To: blaird@azbar.org
Cc: ABDO, AMY
Subject: RE: Follow up to February 13 Telephone Conference

According to Mr. Chen's sworn testimony he is. But we will sent a 30(b)(6) notice to be sure.

-----Original Message-----

From: Brian A. Laird [mailto:blaird@azbar.org]
Sent: Thursday, February 22, 2007 10:46 AM
To: WEINSTEIN, JANET
Cc: blaird@azbar.org; ABDO, AMY
Subject: RE: Follow up to February 13 Telephone Conference

Dear Janet:

He is not a 30(b)(6) witness, but I agree that you have a right to this information and I will provide immediately as soon as I have it.

Sincerely,

Brian Laird

> Brian:

>
> He has been identified as the person with the most knowledge of some
> of your clients' alleged defenses. We need to depose him and have the
> right to do so. There should not be any delay in getting his contact
> information to us. We will be happy to depose him in Florida but we
> need to get it scheduled now.

> Thank you,

> Jan Weinstein

> -----Original Message-----

> From: Brian A. Laird [mailto:blaird@azbar.org]
> Sent: Wednesday, February 21, 2007 3:01 PM
> To: ABDO, AMY
> Cc: blaird@azbar.org; WEINSTEIN, JANET
> Subject: Re: Follow up to February 13 Telephone Conference

> I have requested his telephone number and address and will get them to
> you as soon as I have them.

> In our conversation I stated that I would attempt to get you an answer
> as to whether he would fly to Tucson to sit for deposition
> voluntarily. I stated that if I was unable to get such an assurance to
> you by Friday you should assume that I would not be able to do so.

> If I am able to arrange for a voluntary trip to Tucson by Mr.
> Mitchell, I will notify you immediately. I also told you that Mr.
> Mitchell has stated that he was reluctant to do this because he has a
> newborn child and does not want to leave his wife alone in Florida.

> Sincerely,

> Brian Laird

>

>

>

>> Brian:

>> I wanted to follow up on our February 13 telephone conference. You
>> agreed to let us know by last Friday whether Wayne Mitchell will
>> travel to Tucson for his deposition. Have you confirmed with Mr. Mitchell?
>> Also, you agreed that if Mr. Mitchell will not voluntarily appear,
>> you will confirm his current address.

>> Please get back to me with the promised information as soon as possible.

>>

>>

>> Thanks!

>>

>>

>>

Amy Abdo

>> Fennemore Craig, P.C.

>> 3003 N. Central Ave., Suite 2600

>> Phoenix, AZ 85012-2913

>> 602.916.5399 (telephone)

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>>

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>> has been sent to you in error, do not read it. Please immediately
>> reply to the sender that you have received the message in error. Then
>> delete it.

>> Thank

>> you.

>>

>

>

Brian A. Laird

From: ABDO, AMY [AABDO@FCLAW.COM]
Sent: Tuesday, February 13, 2007 4:47 PM
To: blaird@azbar.org
Cc: WEINSTEIN, JANET
Subject: Telephonic appearance at Florida depositions

Brian:

If the depositions are taken in Florida, we do not object to your telephonic appearance.

Amy Abdo
Fennemore Craig, P.C.
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Phoenix, AZ 85012-2913
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