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July 24, 2010

VIA E-MAIL, US MAIL AND HAND DELIVERY

Ira P. Gould
Law Offices of Ira Gould
120 N. LaSalle Street, Suite 2750
Chicago, Illinois 60602-2422

Re: Pringle Matter

Dear Ira and Ryan,

This letter is sent to confirm the information sent to you on Friday July 23, 2010 regarding the Pringle matter and to confirm, by letter, my request for preservation of evidence.

In my email of Friday July 23, 2010 I relayed the following information:

I also wanted to follow up with you regarding the Pringle matter as I know you intend to soon travel to meet him for the first time. During our meeting you affirmatively represented to me that you would never bring a claim if there were questions about its veracity. Your prior emails indicate your acknowledgement of the reputational harm that could be caused to my clients by the mere filing of a claim (legitimate or not). I share this information with you out of respect for you and Ryan and out of interest in keeping illegitimate claims where they belong.

I thought it was important to provide an example of the concerns I expressed during our meeting today. I also wanted to provide you with one example of why I have legitimate questions over the authenticity of Mr. Pringle's representations regarding the dates of his computer files. There are more examples, but this one should be sufficient. The basis for my concerns and my preservation request that follows is set forth below.

On May 21, 2010 you sent me a letter with several sets of two disc's, each set had a CD in an orange case and a CD in a purple case.

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You said in your letter that the CD in the Orange case was the Dance Version of Take a Dive, which was created in 1999. You represented that the CD in the purple case was the "Original Version of Take a Dive" which was copyrighted in 1998. We understand that these disc's were prepared by Mr. Pringle, and sent to you.

In the body of the May 21, 2010 letter you represent that Mr. Pringle wrote the Original Version of Take a Dive in 1997, and the Original Version was copyrighted in 1998.

I attach a pdf of a screen shot of the properties files of set one of the orange disc you sent me. The creation date and the modified date of this orange disc "Take a Dive Dance Version" file is December 31, 1994 at 7:00:02 pm. This is at least 5 years before you represent he allegedly created the Dance Version and three 3 years before he even allegedly wrote the original version of Take a Dive. The orange disc from set 2 of your May 21, 2010 letter has a different creation time. Interestingly, if you copy the file from the orange disc to your desk top, it changes these dates to the following: Created today, with a last modified date of December 31, 1994.

Would you please provide me with an explanation of the 1994 creation date?

I hope you share our genuine concerns regarding the computer files Mr. Pringle is using to try to convince you (and us) that his dates are what he is holding them out to be. I am sure you are aware that there are easy ways for Mr. Pringle to modify the Creation, Accessed and Modified dates of his computer files. There are software programs available on the internet that permit it, and there are articles all over the web with step by step instructions on how to alter these dates.

Since he is an "unsolicited client" from Texas that you have never represented before or met before, I am not sure how you can confront Mr. Pringle with this information without running the risk of him altering or tampering with computer files in the future to try to "fix" things. Given that you have advanced a claim on his behalf I am sure you have already advised Mr. Pringle of his duty to preserve all computer records. Out of caution, before Mr. Pringle is confronted with the topic of potential altered dates etc, it is likely appropriate for you to have an independent forensic computer person image his entire hard drive etc. to capture and preserve everything on his system before you confront him. It will be something we will necessarily request in discovery should this case ever reach a filed action. I leave the

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preservation mechanism to your choice as long as there is a mechanism put in place to preserve the evidence before he is alerted to concerns over his file dating practices and inconsistencies.

On behalf of my clients', as I am sure you understand, I have to formally make a request for preservation of evidence. Please consider this email my formal request for preservation of evidence.

I am happy to discuss this with you further. I am hopeful that you will be candid with me. Since I am on the road, but still working (sigh), my cell number is the most appropriate way to reach me.

I wanted to reconfirm this by letter since I did not hear from you in response to my email, and because I believe it is important to keep preservation requests in a more formal correspondence.

Very truly yours,

/s/Kara Cenar

Kara E. F. Cenar

KEC

cc:

Ed McPherson
Linda Burrow