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June 7, 2007

Christine Nicolaides Kearns, Esq.
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Re: *Gross v. Akin Gump Strauss Hauer & Feld LLP*, 07-399 (EGS)

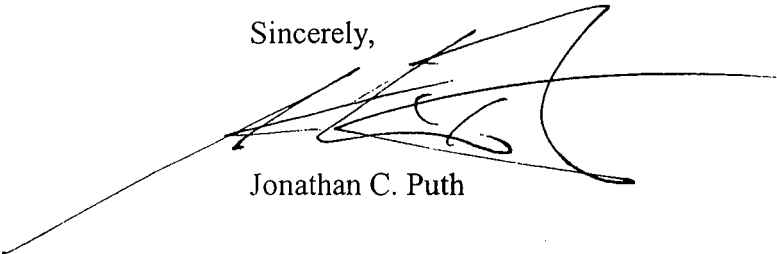
Dear Tina:

I have given some further thought to your comments during our telephone discussion May 30th regarding discovery, and in particular the discovery of pay and bonus, etc. information for attorneys holding the Senior Counsel title and for all attorneys, regardless of title, in the Korea Practice Group. Our position is that, had Mr. Gross not been terminated because of his age, his pay would not have remained static. Rather, Mr. Gross' pay would have increased along the lines of the pay increases accorded his Senior Counsel and/or Korean Practice Group colleagues at Akin Gump, and he would have shared in any bonuses or other compensation that were distributed.

While these issues had been the subject of my letter of May 14th and our subsequent telephone conversation two weeks later, I wanted to reiterate the importance of this discovery, particularly in light of the impending July 13, 2007 deadline for expert designations in this case. As I have shared with you, we anticipate engaging an expert on the subject of lost pay, including front pay. Any calculation of back pay and front pay should likely consider baseline data for comparison. While I understand that you have concerns regarding the confidential nature of these matters, they may be addressed through an appropriate protective order.

Thank you for your attention to these matters. Please feel free to contact me to discuss.

Sincerely,



Jonathan C. Puth

cc: Donald G. Gross, Esq.