

EXHIBIT A

Albrecht, Shari

From: Albrecht, Shari
Sent: Wednesday, December 19, 2007 7:02 AM
To: 'lhrproductions@aol.com'; 'lhrdirect@yahoo.com'
Cc: Naar, Sonya D.
Subject: Re: Rank v. Robbins

Lance,

The document that you sent by e-mail regarding your financial information was not in Word format. The file extension was .wps, and I was not able to open in either in WordPerfect or in Word. The firm's computing people were able to view a portion of the document, but not all of it. I received your FedEx package on Monday that contained a cover letter, two sets of credit information, and unsigned "draft" tax forms for 2005 and 2006. If you have any additional information to provide that was not included in that packet, I would ask that you either send a hard copy or a fax to me at 312-630-7349.

Your tax forms raise a lot of questions. As I mentioned in court, you show income of \$161,000 in wages and salary for both years, but you did not send us W-2s or any other documents that support the numbers in your tax forms. The schedules to the tax returns show information related to various companies, a rental property, and other income from investments, but you have provided us with no information regarding any of those, and certainly no information that we could verify or that my client could use as a basis for agreeing to a settlement.

Your statements in court on Tuesday morning indicated that you are expecting my client to agree to drop this lawsuit based on your current financial condition. You have referred to a "nominal settlement" but have not specified what such a settlement would be. If you would like for settlement discussions to move forward, perhaps you could let me know exactly what you are offering so that we could take it back to the client and discuss.

Judge Moran also suggested that we discuss your current discovery responses. I refer you to Federal Rule of Civil Procedure 36. Rule 36 requires that the reasons for any objection be stated; thus, references to your "general objections" are improper. Further, "[a]n answering party may not give lack of information or knowledge as a reason for failure to admit or deny unless the party states that the party has made reasonable inquiry and that the information known or readily obtainable by the party is insufficient to enable the party to admit or deny." Thus, responses like "not within the scope of my information and belief" are improper. Additionally, Rule 36 requires that you either admit or deny each request, or "set forth in detail the reasons why the answering party cannot truthfully admit or deny the matter." In many of your responses, you do not admit or deny, but rather make a statement about your interpretation of DDN's agreement with Deluxe - see, for example, Request No. 100. Please provide any amended responses to the requests for admission by December 30, so that we can review them in advance of the hearing on January 2.

Please do not hesitate to call me or Sonya Naar (312-368-2167) with any questions.

Shari Albrecht
DLA Piper
312-368-2106

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

From: lhrproductions@aol.com [mailto:lhrproductions@aol.com]
Sent: Monday, December 17, 2007 11:10 AM
To: Albrecht, Shari
Cc: Noele shannon; Noele Shannon Wayne
Subject: Re: ASSET AND LIABILITIES...CURRENT STATUS..LANCE ROBBINS ADV. RANK

You should receive a fax x package this morning with all the supporting financial documents. The attachment was a simple word document but will resend. The answers to requests etc will be fedxed today and also emailed.

Sent via BlackBerry by AT&T

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

From: "Albrecht, Shari" <Shari.Albrecht@dlapiper.com>

Date: Mon, 17 Dec 2007 08:14:37

To: <LHRProductions@aol.com>, <lhrdirect@yahoo.com>

Cc: "Naar, Sonya D." <sonya.naar@dlapiper.com>

Subject: RE: ASSET AND LIABILITIES...CURRENT STATUS..LANCE ROBBINS ADV. RANK

Lance,

The file that you sent was not readable, except for a "statement of assets and liabilities" on the last page. Please fax the complete document with any additional supporting documentation. Please send these to my direct fax number, 312-630-7349. Also, we have not received any discovery responses from you at this time.

Shari Albrecht
DLA Piper
312-368-2106

From: LHRProductions@aol.com [mailto:LHRProductions@aol.com]
Sent: Sunday, December 16, 2007 7:38 PM
To: Albrecht, Shari
Subject: ASSET AND LIABILITIES...CURRENT STATUS..LANCE ROBBINS ADV. RANK

Per your request and for the purposes of discussing any potential settlement.
answers to requests and interrogs to follow.
copies of all documents sent to you are also being copied to Judge Moran.
thank you for your consideration.

LANCE H. ROBBINS
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See AOL's top rated recipes <<http://food.aol.com/top-rated-recipes?NCID=aoltop00030000000004>> and easy ways to stay in shape
<<http://body.aol.com/fitness/winter-exercise?NCID=aoltop00030000000003>> for winter.