

EXHIBIT “B”



Bill Gagas <billgagas@gmail.com>

Motion to File Affidavit

klm4law <klm4law@aol.com>
Reply-To: klm4law <klm4law@aol.com>
To: Billgemail <billgagas@gmail.com>

Wed, Oct 30, 2013 at 4:52 PM

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----- Original message -----

From: klm4law <klm4law@aol.com>
Date: 10/30/2013 1:01 PM (GMT-05:00)
To: BBoland@foley.com
Subject: RE: Motion to File Affidavit

You just don't get it. You need to file a motion for leave to file supplemental affidavit, without the affidavit, to which I will object. If you don't do it this way, I will move to strike and seek sanctions with this email.

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----- Original message -----

From: BBoland@foley.com
Date: 10/30/2013 12:51 PM (GMT-05:00)
To: "Keith L. Miller Esq. (klm4law@aol.com)" <klm4law@aol.com>, "Bill Gagas (billgagas@gmail.com)" <billgagas@gmail.com>
Subject: Motion to File Affidavit

From the Desk of: Beth I. Z. Boland



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Keith:

In light of some of the court's comments/questions raised at the 9/25/13 hearing about the organizational structure of JPMC's AML Ops Unit vs its other means by which to detect bank fraud, we have prepared an affidavit to the court to edify that issue in the event Ms. Ward's affidavits weren't clear enough.

Please let us know by 4:00 today whether you assent/do not object to us filing a motion for leave to file such an affidavit.


Thank you –

Beth

Beth I.Z. Boland • Partner • Foley & Lardner LLP

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