EXHIBIT 1

From: "Rick Robol" <rrobol@columbuscounsel.com>
To: "James Piggush" <piggushj@michigan.gov>
Date: 6/8/2005 12:14:13 PM
Subject: Re: sonar copies

Huh??? What are you saying? I don't understand. Are you sending me the check or not?
----- Original Message -----
From: "James Piggush" <piggushj@michigan.gov>
To: "Rick Robol" <rrobol@columbuscounsel.com>
Sent: Wednesday, June 08, 2005 12:01 PM
Subject: Re: sonar copies

Rick:

I sounds as though significant copying cost can be avoided by the disclosure of the precise location of the Defendant. The Court conditioned its denial of the State's motion, construed as a motion for more definite statement, upon that disclosure, so it seems an exercize in futility to delete that material at great expense. Perhaps the elimination of that futility would bring cost of reproduction into line.

The intervenors requested production of the materials for review, and have not yet requested any copies. The significant cost of making copies of everything requested indicates the wisdom of their request to review before ordering copies.

Perhaps you could box the materials and send them to this office or to the office of counsel in Grand Rapids so the intervenors can begin their review.

Jim

>>> "Rick Robol" <rrobol@columbuscounsel.com> 6/8/2005 11:07:49 AM >>>
Jim-

The format of the side scan sonar material has the site locational information and that would have to be deleted-- hence the significant cost.s. To save time, how about sending me a check for just $5,000 to cover the initial costs of copying of the various items, and then you can send me a check for the balance once we get the final bill? (I'll just have my firm advance the costs and then get reimbursed by your office to save time.)

If that's not workable, let me know right away; otherwise, I'll go ahead and put in the order and let them know you're federal expressing the check.

Thanks!

Rick
Have a good vacation!

Rick
----- Original Message -----
From: "James Piggush" <piggushj@michigan.gov>
To: <rrobol@columbuscounsel.com>
Sent: Wednesday, June 08, 2005 10:27 AM

Subject: sonar copies

Rick:

I have talked with my people, who expect that it would be useful to review the sonar printouts before going ahead with copying. Is the material available in digital form or is it all paper? When might they be able to review it?

I expect that you will want to have some assurances in place before providing access to any information that discloses the location of the find. Where are we in formulating appropriate protection?

When will the requested materials that do not disclose the precise location of the find be available?

I am in for the rest of today but will be out of the office tomorrow and Friday, returning on Monday.

Jim

From: "Rick Robol" <rrobol@columbuscounsel.com>
To: "James Piggush" <piggushj@michigan.gov>
Date: 5/31/2005 2:02:57 PM
Subject: Re: Great Lakes discovery

Rick-

Unfortunately, the side scan imprints contain exact, pinpoint locations.

I'll tell the contactor not to put our order on "hold" until I hear further from you on whether they want to spend the $30T.

Rick
---- Original Message -----
From: "James Piggush" <piggushj@michigan.gov>
To: <rrobol@columbuscounsel.com>
Sent: Tuesday, May 31, 2005 9:40 AM
Subject: Re: Great Lakes discovery

Rick:

In light of the substantial cost of the side scan sonar suvey copies, I expect my clients will want to review the materials beforehand. I won't be able to get their answer on that before the beginning of next week. If any significant part of the cost is associated with redaction, why wouldn't court protection against disclosure make that undertaking unnecessary?

Jim.

>>> <rrobol@columbuscounsel.com> 5/26/2005 2:33:11 PM >>>
Jim-

I'm sorry to hear about the surgery and hope you are feeling better. If I can
do anything to help, please let me know.

I'm not in a position to download your note, but I should be able to do so on my
office computer on Friday.

In the meantime, my people have been assembling the needed documents. It appears that the only significant expense to your clients will be for the side
scan sonar survey (redacted to remove exact locations). The cost of this will
be approximately $30,000. (Our law firm's policy is to traditionally require
payment of discovery expenses in excess of $5,000 in advance, otherwise, we would advance this payment on the State's behalf). It is my assumption that your clients desire to get a copy of the side scan survey, and we have made arrangements to get it for you upon payment. Would you please send me a check
for $30,000 to cover that expense?

As soon as I get that in and we get the Order entered, we can go ahead and start
sending these things.

Regards,

Rick

Quoting James Piggush <piggushj@michigan.gov>:

> Rick,
>
> In light of the court's May 10 order, I have substantially revised the
> proposal relating to protection of discovery materials. I hope this draft
> will serve as the basis for moving forward with discovery.
>
> Sorry this has taken so long. The delay was a function of another trial
> and
> some hand surgery.
>
> Give me a call after you have had a chance to review the attached.
>
> Jim
>
>