

EXHIBIT J

D'Alessandro, Lisa A. (Para-NJ-LT)

From: Richard E. Brodsky [rbrodsky@thebrodskylawfirm.com]
Sent: Thursday, April 05, 2012 11:03 AM
To: Smith, Louis (Shld-NJ-LT)
Subject: Re: Amexco 30(b)(6)

As you wish. As it turns out, I have a family medical issue that needs to be attended to on the 10th, so I am postponing the depo.

On Apr 4, 2012, at 6:04 PM, smithlo@gtlaw.com wrote:

In light of the time period and topics covered (which themselves are objectionable), it is unduly burdensome for non-party American Express to investigate and identify all the people required to address the various topics. As we have been unable to resolve this matter, we will be seeking relief from the Court.

From: Richard E. Brodsky [mailto:rbrodsky@thebrodskylawfirm.com]
Sent: Monday, April 02, 2012 4:41 PM
To: Smith, Louis (Shld-NJ-LT)
Subject: Amexco 30(b)(6)

You were to get back to me to tell me how many people would be required to be approached to supply the information under the different topics. So far, we cannot determine from the documents produced by Amexco who would be a suitable witness.

If you want to make any progress on this, I hope to hear from you soon.

Richard E. Brodsky
Attorney at Law
The Brodsky Law Firm
66 West Flagler Street, 9th Floor
Miami, Florida 33130
Tel.: 786-220-3328
Cell: 305-962-7497
Fax: 866-564-8231
rbrodsky@thebrodskylawfirm.com

If you are not an intended recipient of confidential and privileged information in this email, please delete it, notify us immediately at postmaster@gtlaw.com, and do not use or disseminate such information. Pursuant to IRS Circular 230, any tax advice in this email may not be used to avoid tax penalties or to promote, market or recommend any matter herein.

4/5/2012

Richard E. Brodsky
Attorney at Law
The Brodsky Law Firm
66 West Flagler Street, 9th Floor
Miami, Florida 33130
Tel.: 786-220-3328
Cell: 305-962-7497
Fax: 866-564-8231
rbrodsky@thebrodskylawfirm.com