

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GUCCI AMERICA, INC., :
 :
 Plaintiff, : Case No. 09 CV 6925 (HB)
 :
 -against- :
 :
 FRONTLINE PROCESSING CORPORATION, : AFFIDAVIT OF G.
 MERCHANT SERVICES LLC d/b/a NATIONAL : TRENTON HOOPER, ESQ.
 BANKCARD SYSTEMS OF DURANGO, ABC :
 COMPANIES and JOHN DOES, :
 :
 Defendants. :
 :
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STATE OF MONTANA)
) : ss.
 COUNTY OF YELLOWSTONE)

G. TRENTON HOOPER, attorney for Crowley Fleck PLLP, being duly sworn,
deposes and says:

1. I am an associate attorney for Crowley Fleck PLLP which represents the
Defendant Frontline Processing Corporation (“Frontline”) in this lawsuit. One of my
responsibilities in responding to Plaintiff’s Requests for Production has been to
coordinate the extraction and production of documents and data from Frontline’s
computer systems.

2. After the initial review of Plaintiff’s Request for Production, it was
apparent that a broad search of Frontline’s computer systems would be necessary to
provide all responsive documents. Additionally, the requests sought documents that
would include confidential customer information such as credit card numbers, private

financial information, social security numbers, and other private information. The handling of private credit card information is governed by federal law that requires that security protocol be in place to prevent it's loss or compromise. Conducting e-discovery with these additional security measures in place has added to the time and expense necessary to prepare the production set.

3. The steps that have been taken to extract and prepare the documents for production are set out below.

4. First, we engaged Entré Technologies to physically copy all computer workstations, servers, and other data storage devices so that they could be searched for relevant documents without interrupting Frontline's day-to-day processing services. To ensure that data would be transferred in a secure environment and without connection to the internet, additional planning meetings were necessary and additional hardware was purchased.

5. On January 6, 2010 I accompanied technicians from Entré Technologies to Frontline to physically copy the data from Frontline's computer systems. Starting at the close of business, Entré copied nineteen active workstations, additional out of service workstations, and several servers onto twenty-four external hard drives.

6. Due to the sensitivity of the data contained on these external hard drives, we locked them in a safe that has been under the care and supervision of Crowley Fleck attorneys and staff since it left Frontline. We have also maintained an inventory of the

safe and have employed a check-out /check-in procedure if any of the drives need to be used.

7. With a full copy of Frontline's computer systems we crafted a set of search terms to use in searching the data from Frontline's systems. Due to the broad nature of Gucci's discovery request, the search terms were crafted to also be broad and yield all responsive documents.

8. On January 12, 2010 Entré Technologies began the search of Frontline's system data for documents containing the relevant search terms. This process took several days and was supervised by Crowley Fleck staff and attorneys.

9. When Entré Technologies completed their search they had extracted all files and documents in their native form, organized by computer station user or server name. This data was roughly 7.6 gigabytes.

10. On January 18, the date this data was received, I began a preliminary review of the data to determine the quantity of relevant data returned and to assess whether it could be reviewed in its current format. It became apparent that the documents could not be reviewed in their native format due to the additional time required to open and view each document in its native program and the quantity of documents.

11. To convert the native files into more easily reviewable .tif images, we engage the services of Lighthouse Document Technologies ("Lighthouse"). To ensure the security of the data we purchased three encrypted flash drives: two to send the data

out and one for Lighthouse to send their document images back to us. We also had lighthouse agree to process the information on a stand-alone server.

12. On January 20, 2010, the encrypted flash drives were securely shipped to Lighthouse. Lighthouse's conversion of the files to .tif images resulted in roughly 75,000 documents. In addition to these documents were several hundred more files that could not be converted for varying reasons. These additional files were returned to us in their native form and will have to be reviewed individually on a computer.

13. On January 29, 2010 the encrypted drives were received back from Lighthouse and two isolated workstations were built to allow for secure review of the data.

14. On, January 30, 2010 attorney Chris Stoneback and I began reviewing of the documents. After determining the most efficient search procedure, we spent several hours reviewing documents. To gauge the rate at which the documents could be reviewed we noted the number of documents that we covered during the final hour of work. The number was roughly 250 documents in one hour between two attorneys.

15. The documents are loaded with credit card numbers and other private information that will require substantial redaction. Until this and other sensitive information is redacted we continue to lock-up the hard drives and flash drives containing this information whenever they are not actively being used. The hard drives are removed from the isolated workstations at the end of each session.

16. To this point I have spent 48.5 hours coordinating this project. That time has primarily been spent coordinating contractor compliance with security protocol, accompanying Entré to Frontline for data extraction, and reviewing data for form and accessibility.

17. Paralegal Kelsey Golden has to spent 16.7 hours supervising Entré and coordinating production from Lighthouse.

18. Crowley Fleck IT Technician, Larry Billinger, has spent roughly 12 hours supervising Entré and constructing isolated search terminals where the data can securely be reviewed.

19. The total cost of Entré's services was \$12,465.97.

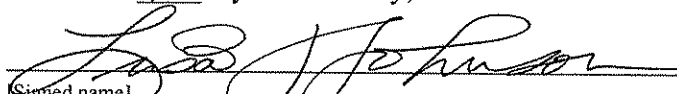
20. We have not yet received Lighthouse's invoice but the estimated cost for services was \$6,000.

THE AFFIANT SAYS NOTHING FURTHER.

Dated this 1st day of February, 2010.


G. TRENTON HOOPER

Subscribed and sworn to before me this 1st day of February, 2010.


[Signed name]
LISA J JOHNSON

[Printed name]
Notary Public for the State of Montana
Residing at Billings, Montana
My Commission Expires: June 02, 2013



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NOTARY PUBLIC for the State of Montana
Residing at Billings, Montana
My Commission Expires
June 02, 2013