



5. In order to comply fully with this request, I sent fourteen (14) letters to various law firms and experts whom have been involved with this case, requesting that they produce all items, as described in paragraph 2 of the Order, in their possession, custody, or control. True and correct copies of all such letters are attached hereto as Exhibit A.

6. As of today, I have received responses from only seven (7) of the law firms and experts I contacted.

7. Plaintiff's expert John Paul Osborn has informed me that he will not be available to provide Plaintiff with any responsive documents until August 29, 2011, the date by which the Order requires compliance.

8. Upon information and belief, each of Plaintiff's law firms and experts, former and current, are likely to have a multitude of responsive electronic documents and it will require enormous efforts to comb through those documents to remove privileged, irrelevant matter. As such, it is highly improbable that Plaintiff will be able to timely comply with the August 18, 2011 Order.

I hereby certify and declare under penalty of perjury that the foregoing is true and accurate.

**DATED: August 22, 2011**

s/ Nathan A. Shaman