

# EXHIBIT B

---

**From:** Dean Boland <dean@bolandlegal.com>  
**Sent:** Monday, November 28, 2011 11:18 PM  
**To:** Southwell, Alexander  
**Cc:** Paul Argentieri  
**Subject:** Re: Letter re electronic files from Grant

After Stroz searches their floppies if they cannot find the information in our filings, let me know.

I am not doing your job and Stroz's job. Get one of the thousand lawyers at your disposal to sit and think.

PLA provided all floppies to Stroz. If none of those are the ones Grant viewed, that is news to me.

Confirm Stroz has evaluated all of those and get back to me.

Dean Boland.

On Mon, Nov 28, 2011 at 10:17 PM, Southwell, Alexander <[ASouthwell@gibsondunn.com](mailto:ASouthwell@gibsondunn.com)> wrote:

Mr. Boland:

In his declaration, Mr. Grant does not describe with any particularity the 41 floppy disks he received from Plaintiff on March 31, 2011. Nor does Mr. Grant describe in any detail the "first 2" floppy disks he determined to be "relevant to this matter." It is therefore impossible to determine whether the disks identified in the Grant declaration were previously provided to Stroz Friedberg by PLA. In order to make that determination, please provide immediately the MD5 hash values for each floppy disk possessed by Mr. Grant, so that Stroz can compare those hash values to the floppy disks provided by PLA, and specify which disks are the "first 2."

More broadly, your response reflects a fundamental misconception regarding Plaintiff's obligations under the Court's July 1 and August 18, 2011 Orders.

First, the July 1st Order required Plaintiff to produce "all electronic copies of the purported emails described in the Amended Complaint." Doc. No. 83 at 2. By failing to produce the electronic copies of the purported emails made by Mr. Grant three months earlier, Plaintiff violated the Court's July 1st Order.

Second, the August 18th Order required Plaintiff to identify, by name and location, "all electronic versions of any emails or purported emails by and among Defendant Zuckerberg, Plaintiff and/or persons associated with StreetFax." Doc. No. 117 ¶ 2. By failing to identify the electronic copies of the purported emails made by Mr. Grant, Plaintiff violated the Court's August 18th Order. Indeed, Plaintiff organized his August 29th sworn declaration by the source of each electronic file required by the August 18th Order; Mr. Grant's name is conspicuously absent from that sworn declaration.

As noted in our November 25, 2011 letter, we expect that Plaintiff will address in his Supplemental Declaration, produce for inspection, and certify the production of, the electronic items in Mr. Grant's possession, as required by the Court's orders.

We reserve all rights, including the right to seek fees, costs, and appropriate sanctions for Plaintiff's ongoing non-compliance.

Thanks

Alex

**From:** Dean Boland [mailto:[dean@bolandlegal.com](mailto:dean@bolandlegal.com)]  
**Sent:** Saturday, November 26, 2011 1:06 AM  
**To:** Southwell, Alexander  
**Cc:** [paul.argentieri@gmail.com](mailto:paul.argentieri@gmail.com); Snyder, Orin  
**Subject:** Re: Letter re electronic files from Grant

Alex:

The August 18 order did not require producing information already produced. I have the list from Stroz of the evidence they acquired from PLA. That list has at least 50 floppy disks on it. Are you saying that the floppies in the possession of PLA when Stroz acquired that evidence omitted the floppies PLA had which Mr. Grant had previously imaged and recently evaluated? If Stroz missed those somehow, let me know. It is my understanding that PLA still has those floppies along with everything they produced to Stroz previously. PLA can FEDEX those to Stroz so they can image them again.

Let me know what you discover.

Dean.

On Friday, November 25, 2011, Southwell, Alexander <[ASouthwell@gibsondunn.com](mailto:ASouthwell@gibsondunn.com)> wrote:

> Please see attached letter concerning electronic items in Mr. Grant's possession.

>

>

>

> Alexander H. Southwell

> Partner

>

> GIBSON DUNN

>

> Gibson, Dunn & Crutcher LLP  
> 200 Park Avenue, New York, NY 10166-0193  
> Tel [+1 212.351.3981](tel:+12123513981) • Fax [+1 212.351.6281](tel:+12123516281)  
> [ASouthwell@gibsondunn.com](mailto:ASouthwell@gibsondunn.com) • [www.gibsondunn.com](http://www.gibsondunn.com)

>  
>  
>  
>  
>  
>  
>

> \_\_\_\_\_  
> This message may contain confidential and privileged information. If it has been sent to you in error, please  
reply to advise the sender of the error and then immediately delete this message.

> \_\_\_\_\_

--

Dean Boland

Owner/Member

Boland Legal, LLC  
18123 Sloane Avenue  
Lakewood, Ohio 44107  
[216.236.8080](tel:2162368080) ph  
[866.455.1267](tel:8664551267) fax  
[dean@bolandlegal.com](mailto:dean@bolandlegal.com)

Please note, I typically only review my emails once daily. If there is something urgent in any email, please do not hesitate to contact my office at [216-236-8080](tel:2162368080).

--

Dean Boland  
Owner/Member  
Boland Legal, LLC  
18123 Sloane Avenue  
Lakewood, Ohio 44107  
216.236.8080 ph  
866.455.1267 fax  
[dean@bolandlegal.com](mailto:dean@bolandlegal.com)

Please note, I typically only review my emails once daily. If there is something urgent in any email, please do not hesitate to contact my office at 216-236-8080.