## **EXHIBIT B**

From: Dean Boland

Sent: Thursday, February 09, 2012 2:12:12 PM (UTC-05:00) Eastern Time (US & Canada)

**To:** Southwell, Alexander **Cc:** Paul Argentieri

**Subject:** Re: RE: 20120201 Relevant Materials Log (BRose@strozfriedberg.com)

Alex:

You were copied on the email. I have no idea what is happening on your end.

For the third time now, the privilege log is attached.

Let's see if you can get this one. Advise on that if you would, immediately, as you put it.

And, how are you coming on the Defendant's production due to us under the court's orders?

Also, my review indicates two email addresses that appear in the log attached to this document.

- 1. landlubber39@yahoo.com; and
- 2. paulc@hush.com.

If Defendants provide a consent form, my client will sign it, immediately.

Dean.

On Thu, Feb 9, 2012 at 1:48 PM, Southwell, Alexander < A Southwell@gibsondunn.com > wrote:

Mr. Boland:

I was not copied on your initial email to Mr. Rose. Moreover, the log was not attached to your email immediately below. Please produce the log to Defendants immediately.

Alex

**From:** Dean Boland [mailto:dean@bolandlegal.com] **Sent:** Thursday, February 09, 2012 11:37 AM **To:** Southwell, Alexander; Paul Argentieri

Subject: Fwd: RE: 20120201 Relevant Materials Log (BRose@strozfriedberg.com)

See below.

Dean Boland Owner/Member Boland Legal, LLC <u>dean@bolandlegal.com</u> 216.236.8080

----- Forwarded message -----

From: "Bryan Rose" < BRose@strozfriedberg.com>

Date: Feb 8, 2012 5:04 PM

Subject: RE: 20120201 Relevant Materials Log (BRose@strozfriedberg.com)

To: "Dean Boland (Google Docs)" < <a href="mailto:deanboland@gmail.com">deanboland@gmail.com</a>>

Mr. Boland,

Thank you for sending the privilege log. I have received it and can confirm that it includes a column entitled "Privilege Claim, if Any." Any file for which privilege is claimed will not be produced to Gibson Dunn. If we have any questions as we continue to review the spreadsheet and prepare the production, I will let you know.

Very truly yours,

Bryan J. Rose

**Managing Director** 

Stroz Friedberg, LLC

Tel.: 212.981.6549

Email: <a href="mailto:brose@strozfriedberg.com">brose@strozfriedberg.com</a>

From: Dean Boland (Google Docs) [mailto:deanboland@gmail.com]

Sent: Wednesday, February 08, 2012 5:01 PM

To: Bryan Rose

**Subject:** 20120201 Relevant Materials Log (<u>BRose@strozfriedberg.com</u>)

Attached: 20120201 Relevant Materials Log

## Message from deanboland@gmail.com:

The attached spreadsheet reflects items for which Mr. Ceglia is claiming privilege thus prohibiting Stroz Friedberg from producing those items to Defendants unless otherwise ordered to do so by the court.

Please confirm receipt of this file and the fact that the column adjacent to the column entitled "Description of Relevant Materials" is a column entitled "Privilege Claim, if Any."

The column entitled "Privilege Claim, if Any" as inserted to enable Stroz to see the items for which privilege is being asserted. If that column does not appear in your document or appears but has no privilege claim insertions, please advise before producing anything to Defendants.

Google Docs makes it easy to create, store and share online documents, spreadsheets and presentations.

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.

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Dean Boland Owner/Member Boland Legal, LLC 18123 Sloane Avenue Lakewood, Ohio 44107 216.236.8080 ph 866.455.1267 fax 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.