

Correspondence from Alex Southwell

Dean Boland <dean@bolandlegal.com>

Thu, Feb 16, 2012 at 10:09 PM

To: Alexander Southwell <asouthwell@gibsondunn.com>

Cc: Paul Argentieri <paul.argentieri@gmail.com>

Alex:

A full response to this spurious attempt to manufacture claimed non-compliance is coming. But, as an initial matter, I was the one who told you about the email accounts that my client did not conceal (which implies he knew about them and failed to disclose) but had no memory of even creating or using. In addition, to set the record straight, I asked you on two occasions over the last week to provide these consent forms with no response from you. Any delay in obtaining these consents signed by my client is caused by you. Nonetheless, they have already been sent to him and I anticipate a quick turnaround on their execution.

I will address your panicked claims of inappropriate privilege claims in detail in the next few days.

As for Mr. Ceglia's needing to provide yet another declaration, you have failed to specify what information, *from his personal knowledge*, that he has failed to provide in a prior declaration. Here, I will bold this so you perhaps do not miss it this time and can really focus on the words, they do, after all, carry meaning:

Mr. Ceglia has no personal knowledge now, and had no personal knowledge at any time that Jason Holmberg retained any documents relevant to this case. He cannot, therefore, sign a declaration based upon his personal knowledge.

He can, of course, sign a declaration as to any number of things that other people told him. However, I don't believe such a declaration is proper as the purpose of declarations is for the person declaring something, to be declaring it from personal knowledge.

So, to wrap up, if you want a declaration from Mr. Ceglia NOT based on his personal knowledge, please so state.

Dean.

EXHIBIT B