

# EXHIBIT A

**From:** Dean Boland <[dean@bolandlegal.com](mailto:dean@bolandlegal.com)>

**Date:** June 19, 2012 9:33:53 AM EDT

**To:** Alexander Southwell <[asouthwell@gibsondunn.com](mailto:asouthwell@gibsondunn.com)>, Paul Argentieri <[paul.argentieri@gmail.com](mailto:paul.argentieri@gmail.com)>, Neil Broom <[nbroom@trcglobal.com](mailto:nbroom@trcglobal.com)>, Jim Blanco <[jim@jimblanco.com](mailto:jim@jimblanco.com)>, Larry Stewart <[lfstewart@mac.com](mailto:lfstewart@mac.com)>, Jerry Grant <[grantj@frontiernet.net](mailto:grantj@frontiernet.net)>

**Subject:** Broom deposition and other witnesses

Alex:

Mr. Broom's deposition for next week is a conflict. Also, since you noticed him for deposition away from his office location, I wanted to be clear that Defendants are paying not only his travel expenses to attend his eventual deposition in New York, but also his time spent traveling, billed at a flat \$2,000 per day. Please confirm that and lets talk about a date the following week for his deposition.

I would like to arrange convenient dates to depose Defendants experts instead of just noticing them with demand dates. I would like to depose your tech experts the same day, in the afternoon, that we will eventually have Broom's depo. This allows both experts to attend the other's depo which I assume you planned anyhow.

Same idea for the paper experts, Blanco and Stewart. Depose Blanco in the morning, then Tytell, Lesnevich or LaPorte in the afternoon. Depose Stewart in the morning and then one of your other paper experts in the afternoon. I won't need more than two hours with each of your experts, so we can actually handle deposing two of your paper experts in a single afternoon.

Let's keep working on this. I am sure we can accommodate each others' schedules. If we can't work out the dates, then we can mutually approach the court for some additional days. I am confident we can work it out.

Dean.

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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.

