

# EXHIBIT B

**From:** Dean Boland

**Sent:** Thursday, September 06, 2012 10:27:47 AM (UTC-05:00) Eastern Time (US & Canada)

**To:** Southwell, Alexander H.; Paul Argentieri

**Subject:** Spurious claim of documents we have not produced.

Alex:

Your claim that Mr. Argentieri's recent declaration establishes undisclosed documents is false. Plaintiff and his counsel are well aware of the ongoing duty to supplement discovery. There are no documents in Plaintiff or his counsel's possession, custody or control that have not already been produced. As with Mr. Stewart, no sensible order can be requested which orders Plaintiff or his counsel to produce documents that either have already been produced or are not within our possession, custody or control. This is Defendants' wishful thinking sighing expedition.

Dean Boland.

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Dean Boland

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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.