

# EXHIBIT P

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**From:** Dean Boland <dean@bolandlegal.com>  
**Sent:** Friday, July 20, 2012 6:12 PM  
**To:** Southwell, Alexander H.  
**Cc:** paul.argentieri@gmail.com; Benjamin, Matthew; Aycock, Amanda; Narasimhan, Sripriya  
**Subject:** Re: Letter re Stewart docs

Alex:

I am reviewing the list of items you indicate you still haven't received. Without waiving any objection to your request for materials from Mr. Stewart, I will review this and get back to you.

Mr. Stewart is not coming to New York to be deposed again. He is coming to New York to assist me with the deposition of your witness Gerald LaPorte. I am not agreeing to any deposition of Larry Stewart during that timeframe. I will need to confer with him both before and after all depositions set for next week as I have planned.

If you believe you are entitled to depose him for more than the seven hours you have already consumed, please advise as to your basis for exceeding the seven hours provided for in the rules.

If your basis is the additional materials we have provided you, please know that we are not waiving any objection to the propriety of your request for additional materials, but merely provided materials in the interest of civil cooperation amongst attorneys.

Dean Boland.

On Wed, Jul 18, 2012 at 9:24 PM, Southwell, Alexander H. <[ASouthwell@gibsondunn.com](mailto:ASouthwell@gibsondunn.com)> wrote:

Mr. Boland:

Please provide us by tomorrow the materials from Mr. Stewart discussed in our July 16<sup>th</sup> letter (attached again, without the enclosure). We may want to resume his deposition if he is here next Thursday.

Alex

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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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