

EXHIBIT DD

August 27, 2012

VIA ELECTRONIC MAIL

Dean Boland
Owner/Member
Boland Legal, LLC
1475 Warren Road
Unit 770724
Lakewood, Ohio 44107

Re: Ceglia v. Zuckerberg and Facebook, Inc., No. 1:10-cv-569-RJA-LGF

Mr. Boland:

You and Mr. Stewart have represented to us repeatedly, on the record and off, that you have produced all the materials we have requested. You and Mr. Stewart have made these representations both prior to and in conjunction with your most recent production of August 23, 2012. This August 23 production confirms that those representations are false in at least two ways. First, as this letter thoroughly details, your August 23 production includes documents that you never before provided to us. Second, your August 23 production does not include several relevant known documents that we have requested specifically, by name, in our numerous communications with you.

So that the record is absolutely clear: this letter describes the specific contents of your productions, the specific documents that you produced on August 23 but had not provided previously, and the specific documents that you still have not produced.

I. The October 2011 Production

You state that Mr. Stewart has maintained a duplicate of the CD he FedEx'd to Defendants on October 24, 2011. We have maintained the original of the CD that we received from Mr. Stewart via FedEx on October 25, 2011. It does not contain the materials we have repeatedly requested.

The CD we received on October 25, 2011, contains the following files:

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Folder	Filename	Description
072511images	q1.tif	Front of page 1 of WFH with Defendants' sampling
	q1_0001.tif	Back of page 1 of WFH with Defendants' sampling
	q1_0002.tif	Front of page 2 of WFH with Defendants' sampling
	q1_0003.tif	Back of page 2 of WFH with Defendants' sampling
	q1_0004.pdf	Fronts and backs of pages 1 and 2 of WFH with Defendants' sampling
	q2.tif	Front of page 1 of Specs with Defendants' sampling
	q2_0001.tif	Back of page 1 of Specs with Defendants' sampling
	q2_0002.tif	Front of page 2 of Specs with Defendants' sampling
	q2_0003.tif	Back of page 2 of Specs with Defendants' sampling
	q2_0004.tif	Front of page 3 of Specs with Defendants' sampling
	q2_0005.tif	Back of page 3 of Specs with Defendants' sampling
	q2_0006.tif	Front of page 4 of Specs with Defendants' sampling
	q2_0007.tif	Back of page 4 of Specs with Defendants' sampling
	q2_0008.tif	Front of page 5 of Specs with Defendants' sampling
	q2_0009.tif	Back of page 5 of Specs with Defendants' sampling
	q2_0010.tif	Front of page 6 of Specs with Defendants' sampling
q2_0011.tif	Back of page 6 of Specs with Defendants' sampling	
q2_0012.pdf	Fronts and backs of pages 1 through 6 of Specs with Defendants' sampling	

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072711_JimStuff	q1_LS Scan adjusted.tif	Scan of front of page 1 of WFH with Defendants' sampling, adjusted to increase yellow
	Untitled-3_JimAdjust_ColorDeconv.tif	Scan of front of page 2 of WFH w/o any sampling, upper right corner adjusted to show tab mark
	Untitled-4_JimAdjust_cropped corner.tif	Scan of back of page 2 of WFH w/o any sampling, cropped to show only upper right corner, adjusted to increase yellow
Work For Hire	Untitled-1.tif	Front of page 1 of WFH w/o any sampling
	Untitled-2.tif	Back of page 1 of WFH w/o any sampling
	Untitled-3.tif	Front of page 2 of WFH w/o any sampling
	Untitled-4.tif	Back of page 2 of WFH w/o any sampling
StewartDisc [Main Folder]	051.tif	Front of page 2 of WFH w/o any sampling, cropped to show purported signatures
	052.tif	Front of page 2 of WFH w/o any sampling, cropped to show purported signatures
	053 2.tif	Front of page 2 of WFH w/o any sampling, cropped to show purported signatures
	053.tif	Front of page 2 of WFH w/o any sampling, cropped to show purported signatures
	054 2.tif	Front of page 1 of WFH w/o any sampling, cropped to show interlineation and purported initials
	054.tif	Front of page 1 of WFH w/o any sampling, cropped to show interlineation and

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		purported initials
	055 2.tif	Front of page 1 of WFH w/o any sampling, cropped to show interlineation and purported initials
	055.tif	Front of page 1 of WFH w/o any sampling, cropped to show interlineation and purported initials
	Blancos-Digital Images.pdf	64-page PDF containing photographs of various aspects of WFH and Specs, all w/o any sampling
	Work For Hire 2.pdf	Fronts of pages 1 and 2 w/o any sampling
	Work For Hire.pdf	Fronts of pages 1 and 2 w/o any sampling
	Zuckerberg Contract page1.tif	Scan of front of page 1 of WFH with same filename as scan sent from Ceglia to Argentieri on June 17, 2010, w/o any sampling, with staple
	Zuckerberg Contract page2.tif	Scan of front of page 2 of WFH with same filename as scan sent from Ceglia to Argentieri on June 17, 2010, w/o any sampling, with staple
	Zuckerberg Street Fax Specifications.pdf	Fax of fronts of pages 1 through 6 of Specs, with date of "07/23/2010" and "Paul Argentieri" in Fax header, w/o any sampling

Screenshots of the contents of the CD received from Mr. Stewart on October 25, 2011 are attached hereto as Exhibit A.

As noted in your August 23, 2012 email, the CD does contain images with the filenames q1.tif; q1_0001.tif; q1_0002.tif; q1_0003.tif; q1_004.pdf. However, your description of

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what these images represent is inaccurate. In that same email, you claimed, “Specific scans were made in order to document where [Stewart] had taken the plugs of ink, toner and paper. In those images, you can see small holes that correspond to where he took the plugs.”

To be clear: these scans do not document Mr. Stewart’s sampling in any way. As you can see for yourself in the video of the July 25, 2011 inspection, Mr. Stewart took these scans *before* conducting any sampling of the Work for Hire Document. The sampling represented in these scans was done by Defendants’ experts Gerald LaPorte and Dr. Albert Lyter on July 16 and July 19, 2011, respectively. The CD contains absolutely no documentation whatsoever—whether images, handwritten notes, or anything else—of Stewart’s sampling of the Work for Hire or Specifications Documents.

Additionally, you represent in your August 23 email that this October 2011 CD contains “scanned images of the notes [Stewart] took on 7/25/11 which describe the number of plugs and location of where he removed plugs of ink, toner and paper from the FB contract.” This is also false. The CD contains no images of any notes.

You also represent that this October 2011 CD contains “a TLC Worksheet Form showing the toner analysis he conducted and again outlining where the specific samples tested were removed from the FB contract.” This too is demonstrably false. The CD contains no images of any TLC Worksheet Form whatsoever.

II. The July 5, 2012 Production

You produced some materials on July 5, 2011, prior to Mr. Stewart’s deposition. Specifically, you produced via YouSendIt a handful of digital photographs of portions of documents and other materials, rather than providing legible scans or complete photocopies of full-page documents. Many of the photographed materials were incomplete (such as a photograph of the top portion of an inventory worksheet), or were useless or non-responsive (such as a photograph of the front of a leather-bound book bearing the title “Ledger”).

The YouSendIt file we received on July 5, 2012 contains the following files:

Folder	Filename	Description
Stewart Deposition Information [Main Folder]	IMG_0814.jpg	Front of a leather-bound book bearing the title “Ledger”
	IMG_0825.JPG	Top portion of document dated 7/25/11, titled “TLC Worksheet Form” with only

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		first row of entries visible; this partial image is on the record as Defendants' Ex. 25; the full page was produced for the first time at Stewart's July 11, 2012 deposition and is on the record as Defendants' Ex. 26
	IMG_0834.JPG	Top portion of document dated 7/29/11, notated with "Plate #1," titled "TLC Worksheet Form" with first 6 rows of entries visible
	IMG_0835.JPG	Bottom portion of same document dated 7/29/11, notated with "Plate #1," titled "TLC Worksheet Form" with rows 2 through 10 of entries visible
	IMG_0836.JPG	Top portion of printed screenshot of HP web page
	IMG_0837.JPG	Middle portion of same printed screenshot of HP web page
	IMG_0838.JPG	Bottom portion of same printed screenshot of HP web page
	IMG_0839.JPG	Portion of printed screenshot of Amazon.com webpage
	IMG_0840 (1).JPG	FedEx Airbill from Larry Stewart to Walter Rantanen, dated 10/31/11
	IMG_0840.JPG	Duplicate file of FedEx Airbill from Larry Stewart to Walter Rantanen, dated 10/31/11
	IMG_0841.JPG	Top portion of "Test Services Request Form" from Integrated Paper Services, Inc., apparently

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		completed by Larry Stewart
	IMG_0842.JPG	Middle portion of "Test Services Request Form" from Integrated Paper Services, Inc., apparently completed by Larry Stewart
	IMG_0843.JPG	Bottom left portion of "Test Services Request Form" from Integrated Paper Services, Inc., apparently completed by Larry Stewart
	IMG_0844.JPG	Bottom right portion of "Test Services Request Form" from Integrated Paper Services, Inc., apparently completed by Larry Stewart
	IMG_0845.JPG	Top left portion of "Chain of Custody" form bearing date 10/31/11
	IMG_0846.JPG	Top right portion of "Chain of Custody" form bearing date 10/31/11
	IMG_0848.JPG	Blurry, unidentified portion of TLC plate apparently showing 6 visible lanes
	IMG_0849.JPG	Blurry, unidentified portion of TLC plate apparently showing 4 visible lanes, unclear if same plate as above
	IMG_0850.JPG	Back of TLC plate labeled "Plate #1 11-07-100 7/29/11," apparently showing 9 visible lanes, unclear if same plate as above
	IMG_0851.JPG	Front of TLC plate labeled "Plate #1 11-07-100 7/29/11," apparently showing 9 visible lanes,

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		unclear if same plate as 0848 and 0849
	IMG_0852.JPG	Top portion of printed screenshot of Amazon.com webpage
	IMG_0853.JPG	Bottom portion of printed screenshot of Amazon.com webpage
redeposition	HP LaserJet 4200 Printer series-á--á HP Color LaserJet and LaserJet Series Printers - Product Model Nu.webarchive	Webarchive of HP Support Document
	IMG_0473.JPG	Unclear. Appears to be unlabeled TLC plate on top of white paper next to a black or UV lamp.
	Work For Hire.webarchive	Webarchive of Wikipedia article on HP Laserjet

Screenshots of the contents of the YouSendIt file received from you on July 5, 2012 are attached hereto as Exhibit B.

To be clear, none of the materials in this July 5, 2012 production “describe the number of plugs and location of where [Stewart] removed plugs of ink, toner and paper from the FB contract.”

Moreover, the only full “TLC Worksheet Form” provided in this July 5 production (contained in IMG_0834.JPG and IMG_0835.JPG) provides limited information about the samples used in the 10 lanes on Mr. Stewart’s TLC Plate #1. It does not describe at all “where the specific samples tested were removed from the FB contract.” It does not provide any information about where the specific samples tested were removed from the Specifications Document. It does not provide information about the contents of any of the vials in which Mr. Stewart placed the samples taken from the Work for Hire and Specifications Documents.

III. The August 23, 2012 Production

On August 23, 2012, you produced six files (one PDF and five TIF files) from Stewart that you maintained had previously been produced. Indeed, you titled the zip folder containing these materials “Larry Stewart Materials Previously Produced.”

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The YouSendIt file we received on August 23, 2012 contains the following files:

Folder	Filename	Description
Larry Stewart Materials Previously Produced [Main Folder]	DOC082312.pdf	<p><u>Page 1</u>: TLC Worksheet Form describing lanes of TLC Plate #1; the content of this document was produced for first time as photographs of top and bottom of page in July 5, 2012 production, but this document has never before been produced in full.</p> <p><u>Page 2</u>: Undated handwritten notes regarding toner analysis; produced for the first time at Stewart's July 11, 2012 deposition; on the record as Defendants' Ex. 29</p> <p><u>Page 3</u>: Handwritten notes on lined paper dated 7/25/11; produced for the first time at Stewart's July 11, 2012 deposition; on the record as Defendants' Ex. 27</p> <p><u>Pages 4-5</u>: What appears to be photocopy of a scan of a version of the WFH with staple intact and w/o any sampling, and a handwritten note that reads, "Set of copies made 7/25 before Plaintiff's testing (destructive) began." This document has never before been produced.</p> <p><u>Pages 6-9</u>: What appears to be photocopies of the WFH document subsequent to Defendants' sampling of the document on July 16 and 19, but prior to Plaintiff's sampling on July 25, with some circles and numbers that may indicate sampling but that do not add up to the total number of plugs Stewart claimed to have taken in his deposition (re paper samples). Has a handwritten note that reads, "Location map of my plugs 7/25/11." This document has never before been produced.</p>
	q1.tif	Front of page 1 of WFH with Defendants' sampling
	q1_0001.tif	Back of page 1 of WFH with Defendants' sampling
	q1_0002.tif	Front of page 2 of WFH with Defendants' sampling
	q1_0003.tif	Back of page 2 of WFH with Defendants' sampling
	q1_0004.pdf	Fronts and backs of pages 1 and 2 of WFH with Defendants' sampling

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Screenshots of the contents of the YouSendIt file received from you on August 23, 2012 are attached hereto as Exhibit C.

While some of these files, such as the TIF files with filenames q1.tif, q1_0001.tif, q1_0002.tif, q1_0003.tif, and q1_004.pdf had been previously produced, they did not, as discussed above, provide the information you represented they did, namely, information regarding from where on the Work for Hire and Specifications Documents Stewart had taken samples of ink, toner, and paper.

Contrary to your representations, however, the August 23 production contained information that had not been previously produced. Neither you nor Mr. Stewart had ever produced the PDF file contained in the August 23 production with the filename DOC082312.pdf. In fact, the filename itself suggests that the file was created on August 23, 2012, and the internal metadata of the file confirms that it was created on August 23, 2012 at 10:05 a.m. While the information contained in pages 1-3 of this document was produced in July 2012, none of the material contained in this PDF had been produced in October 2011. And while pages 6-9 of this PDF file purport to be a “location map” of Stewart’s plugs supposedly created on July 25, 2011, the number of samples indicated on page 1 do not add up to the number of samples Mr. Stewart claimed he took in his deposition. *See* Stewart Depo. Tr. at 345:4-12 (“Q. How many paper blanks did you take of the Work For Hire contract document? A. Looks like 16 from page 1 and then 16 from page 2 and then an additional 20 from page 1 and an additional 20 from page 2. Q. And what vials were those paper blanks in? A. That would be vial 1, vial 2, vial 7 and vial 9.”).

* * *

In your August 23 email, you wrote that Mr. Stewart “can document that you have received in the past the items we are now sending you again. You and your experts may have not understood what you had, but you definitely have been sent everything.” As this letter makes perfectly plain, that is false. The deficiencies in your and Mr. Stewart’s production are not attributable to any misunderstanding. Rather, your refusal to provide relevant known documents that we have identified specifically and repeatedly is simply another example of your contempt for these proceedings.

First, as this letter has thoroughly detailed, your August 23 production includes documents that you never before provided to us, confirming that you had not given us everything you said you had provided previously.

Second, none of your productions—including the most recent August 23 production—contains the information that we have specifically requested, by name, on numerous occasions. None of these productions contains Mr. Stewart’s notes detailing the contents of

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his sampling vials, which reflect how many samples each vial contained; identification of the document, page, and location the samples were taken; the size of the samples; and other identifying information.

These productions demonstrably do not include known documents to exist reflecting Mr. Stewart's court-authorized sampling. For instance, Mr. Stewart testified at his deposition that he had additional inventory worksheets documenting his ink sampling. *See* Stewart Depo. Tr. at 372:11-373:6. Not a single document produced to Defendants or on the record in this case even suggests that Mr. Stewart conducted ink sampling, much less provides any identifying information about the samples. Additionally, it is obvious from the video of the inspection that Mr. Stewart used two TLC Worksheet Forms to record the contents of his vials. Mr. Stewart only produced the first of these two pages, which is on the record as Defendants' Ex. 26.

The many documents Mr. Stewart has failed to produce, coupled with the few that he actually has, raise serious questions about Mr. Stewart's sampling of the Work for Hire and Specifications Documents, which was conducted pursuant to court order.

Please immediately produce any and all documents reflecting Mr. Stewart's court-authorized sampling of the Work for Hire and Specifications Documents. This includes but is not limited to documents reflecting Mr. Stewart's ink sampling, if any, and the second of the two TLC Worksheet Forms that Mr. Stewart used at the July 25, 2011 inspection to record the contents of his sampling vials. Additionally, please advise whether and when Mr. Stewart took ink samples, or whether Mr. Stewart possesses ink samples. If he possesses ink samples, please advise how he obtained those samples.

Defendants reserve all rights, including the right to move the Court for production of these and other materials and to seek fees, costs, and appropriate sanctions.

Very truly yours,

Handwritten signature in blue ink, appearing to read "AHSwell / AMA".

Alexander H. Southwell

cc: Paul Argentieri, Esq.

EXHIBIT A

Computer > DVD RW Drive (D:) StewartDisc

Search DVD RW Drive (D:) StewartDisc

File Edit View Tools Help

Organize Burn to disc

Desktop

Name	Date created	Type	Size
Files Currently on the Disc (17)			
072511images	8/24/2011 5:41 PM	File folder	
072711_JimStuff	7/27/2011 3:35 PM	File folder	
Work For Hire	8/24/2011 5:40 PM	File folder	
051.tif	7/16/2011 3:32 PM	TIFF image	29,557 KB
052.tif	7/16/2011 3:32 PM	TIFF image	29,554 KB
053 2.tif	7/16/2011 3:32 PM	TIFF image	29,557 KB
053.tif	7/16/2011 3:32 PM	TIFF image	29,557 KB
054 2.tif	7/16/2011 7:58 AM	TIFF image	29,560 KB
054.tif	7/16/2011 7:58 AM	TIFF image	29,560 KB
055 2.tif	7/16/2011 3:31 PM	TIFF image	29,557 KB
055.tif	7/16/2011 3:31 PM	TIFF image	29,557 KB
Blancos-Digital Images.pdf	7/16/2011 4:28 PM	Adobe Acrobat D...	13,681 KB
Work For Hire 2.pdf	7/16/2011 5:53 PM	Adobe Acrobat D...	4,836 KB
Work For Hire.pdf	7/20/2011 7:44 PM	Adobe Acrobat D...	4,825 KB
Zuckerberg Contract page1.tif	7/14/2011 4:18 PM	TIFF image	1,940 KB
Zuckerberg Contract page2.tif	7/14/2011 4:18 PM	TIFF image	1,510 KB
Zuckerberg Street Fax Specifications.pdf	7/14/2011 4:18 PM	Adobe Acrobat D...	4,454 KB
Files Ready to Be Written to the Disc (1)			

072511images Date modified: 8/24/2011 5:41 PM
File folder

1 item selected

Computer > DVD RW Drive (D:) StewartDisc > 072511images

Search 072511images

File Edit View Tools Help

Organize Burn to disc

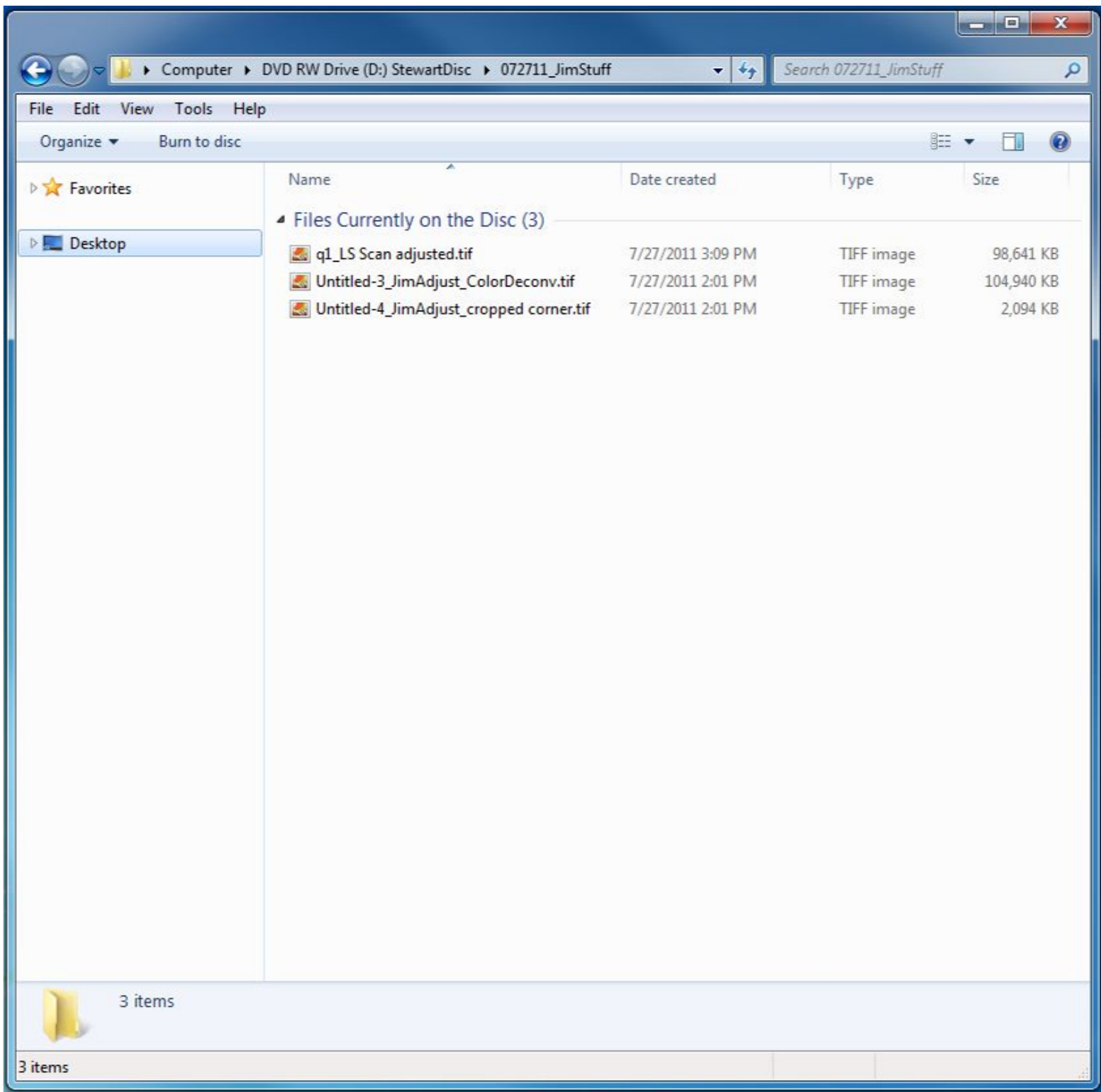
★ Favorites

Desktop

Name	Date created	Type	Size
Files Currently on the Disc (18)			
q1.tif	7/25/2011 10:42 AM	TIFF image	98,614 KB
q1_0001.tif	7/25/2011 10:43 AM	TIFF image	98,614 KB
q1_0002.tif	7/25/2011 10:43 AM	TIFF image	98,614 KB
q1_0003.tif	7/25/2011 10:43 AM	TIFF image	98,614 KB
q1_0004.pdf	7/25/2011 10:43 AM	Adobe Acrobat...	5,848 KB
q2.tif	7/25/2011 11:06 AM	TIFF image	98,614 KB
q2_0001.tif	7/25/2011 11:06 AM	TIFF image	98,614 KB
q2_0002.tif	7/25/2011 11:06 AM	TIFF image	98,614 KB
q2_0003.tif	7/25/2011 11:06 AM	TIFF image	98,614 KB
q2_0004.tif	7/25/2011 11:06 AM	TIFF image	98,614 KB
q2_0005.tif	7/25/2011 11:06 AM	TIFF image	98,614 KB
q2_0006.tif	7/25/2011 11:06 AM	TIFF image	98,614 KB
q2_0007.tif	7/25/2011 11:06 AM	TIFF image	98,614 KB
q2_0008.tif	7/25/2011 11:06 AM	TIFF image	98,614 KB
q2_0009.tif	7/25/2011 11:06 AM	TIFF image	98,614 KB
q2_0010.tif	7/25/2011 11:06 AM	TIFF image	98,614 KB
q2_0011.tif	7/25/2011 11:06 AM	TIFF image	98,614 KB
q2_0012.pdf	7/25/2011 11:07 AM	Adobe Acrobat...	14,375 KB

18 items

18 items



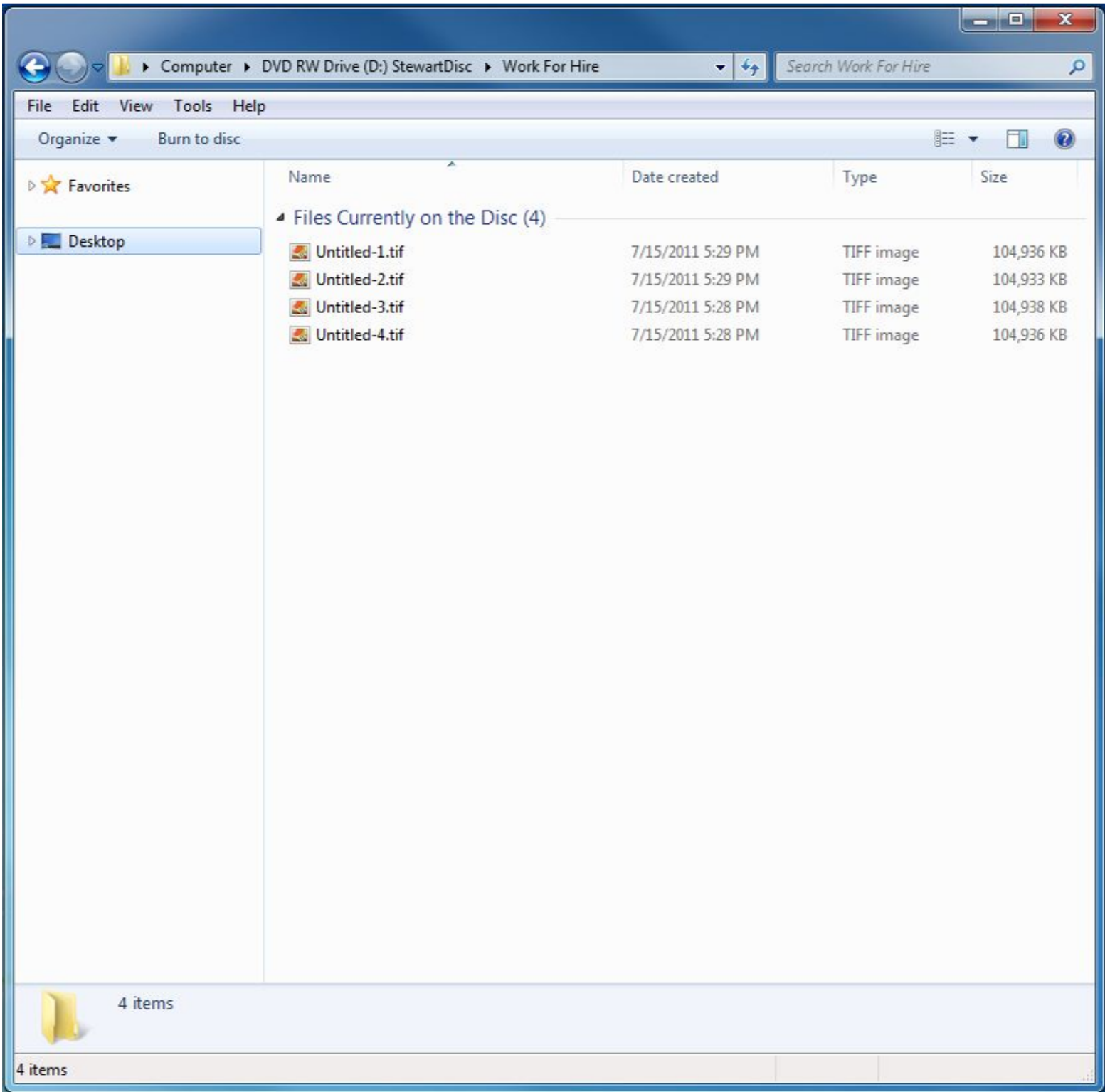


EXHIBIT B

Stewart Deposition Information

Search Stewart Deposition Information

File Edit View Tools Help

Organize Include in library Share with Slide show Burn New folder

★ Favorites

Desktop

Name	Date	Date modified	Type	Size
redeposition	8/24/2012 8:20 PM	8/24/2012 8:20 PM	File folder	
IMG_0814.jpg	7/3/2012 11:42 AM	7/5/2012 9:53 AM	JPEG image	1,686 KB
IMG_0825.JPG	7/3/2012 12:01 PM	7/5/2012 9:52 AM	JPEG image	1,827 KB
IMG_0834.JPG	7/3/2012 12:03 PM	7/5/2012 9:52 AM	JPEG image	1,899 KB
IMG_0835.JPG	7/3/2012 12:03 PM	7/5/2012 9:52 AM	JPEG image	1,836 KB
IMG_0836.JPG	7/3/2012 12:04 PM	7/5/2012 9:52 AM	JPEG image	1,883 KB
IMG_0837.JPG	7/3/2012 12:04 PM	7/5/2012 5:45 PM	JPEG image	2,138 KB
IMG_0838.JPG	7/3/2012 12:04 PM	7/5/2012 5:41 PM	JPEG image	2,124 KB
IMG_0839.JPG	7/3/2012 12:04 PM	7/5/2012 5:45 PM	JPEG image	2,133 KB
IMG_0840 (1).JPG	7/3/2012 12:06 PM	7/5/2012 5:40 PM	JPEG image	2,178 KB
IMG_0840.JPG	7/3/2012 12:06 PM	7/5/2012 9:52 AM	JPEG image	2,178 KB
IMG_0841.JPG	7/3/2012 12:06 PM	7/5/2012 5:40 PM	JPEG image	2,028 KB
IMG_0842.JPG	7/3/2012 12:06 PM	7/5/2012 5:39 PM	JPEG image	2,148 KB
IMG_0843.JPG	7/3/2012 12:06 PM	7/5/2012 9:52 AM	JPEG image	2,231 KB
IMG_0844.JPG	7/3/2012 12:06 PM	7/5/2012 5:39 PM	JPEG image	2,183 KB
IMG_0845.JPG	7/3/2012 12:07 PM	7/5/2012 5:38 PM	JPEG image	1,730 KB
IMG_0846.JPG	7/3/2012 12:07 PM	7/5/2012 5:37 PM	JPEG image	1,745 KB
IMG_0848.JPG	7/3/2012 12:08 PM	7/5/2012 5:36 PM	JPEG image	1,147 KB
IMG_0849.JPG	7/3/2012 12:08 PM	7/5/2012 5:36 PM	JPEG image	1,176 KB
IMG_0850.JPG	7/3/2012 12:08 PM	7/5/2012 5:36 PM	JPEG image	1,181 KB
IMG_0851.JPG	7/3/2012 12:08 PM	7/5/2012 5:36 PM	JPEG image	1,204 KB
IMG_0852.JPG	7/3/2012 12:09 PM	7/5/2012 5:35 PM	JPEG image	1,872 KB
IMG_0853.JPG	7/3/2012 12:09 PM	7/5/2012 9:52 AM	JPEG image	2,346 KB

23 items

23 items

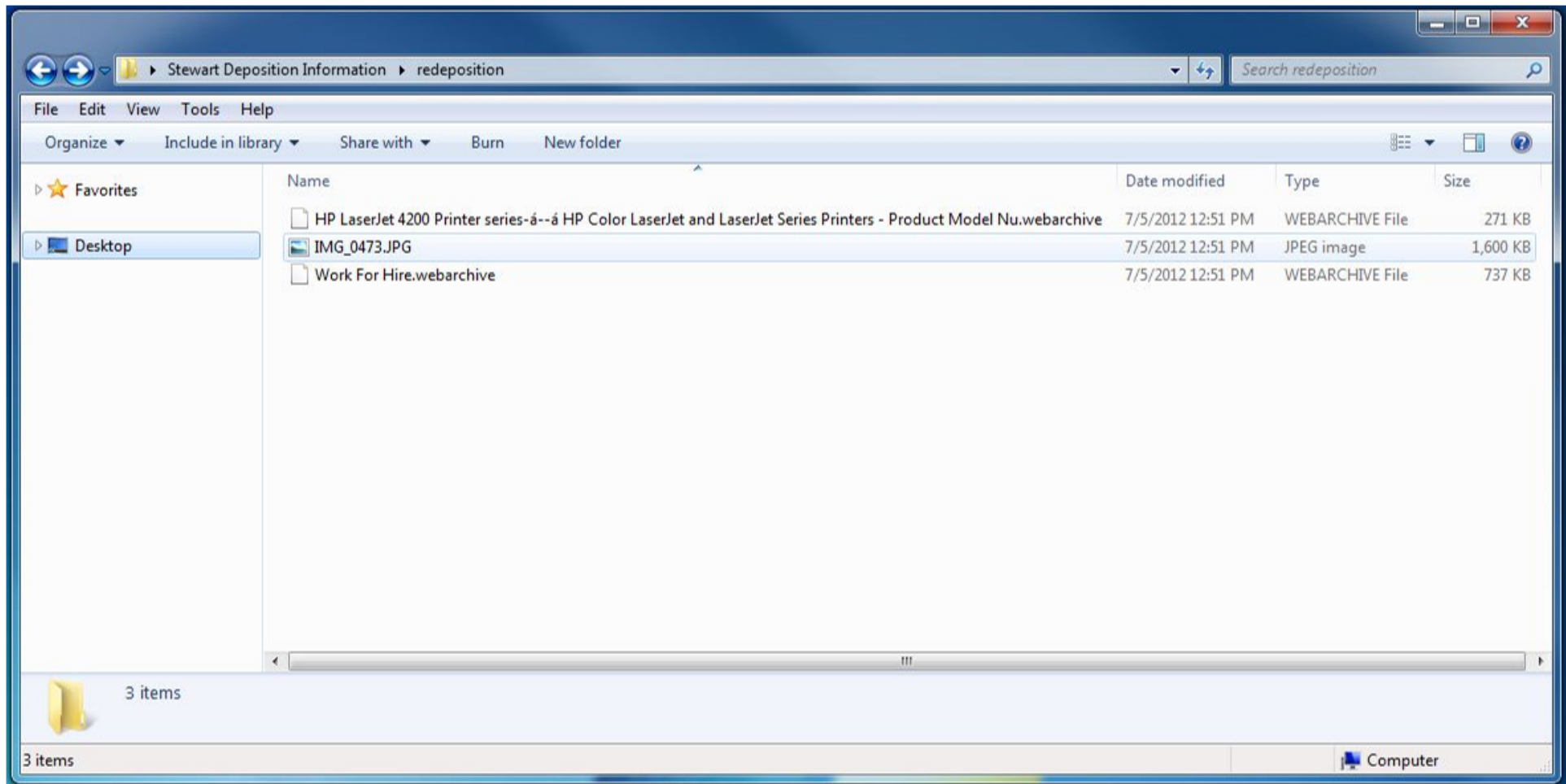
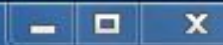


EXHIBIT C



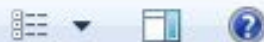
<< Prod... >> Larry Stewart Materials Previously Produced



Search Larry Stewart Materials Previo...

File Edit View Tools Help

Organize New folder



Name	Date created	Type	Size
DOC082312.pdf	8/23/2012 10:15 AM	Adobe Acrobat D...	331 KB
q1.tif	7/25/2011 7:42 AM	TIFF image	98,614 KB
q1_0001.tif	7/25/2011 7:43 AM	TIFF image	98,614 KB
q1_0002.tif	7/25/2011 7:43 AM	TIFF image	98,614 KB
q1_0003.tif	7/25/2011 7:43 AM	TIFF image	98,614 KB
q1_0004.pdf	7/25/2011 7:43 AM	Adobe Acrobat D...	5,848 KB



6 items Offline status: Online
Offline availability: Not available

6 items

Local intranet