

# EXHIBIT KK

---

**Attachments:** responsetoSouthwell09\_04\_12.pdf; ResponsetoSouthwell9\_4\_12.doc;  
ResponsetoSouthwell9\_4\_12.pages

**From:** Dean Boland  
**Sent:** Thursday, September 06, 2012 10:24:29 AM (UTC-05:00) Eastern Time (US & Canada)  
**To:** Southwell, Alexander H.; Paul Argentieri  
**Subject:** Response to 8/30 Stewart production

Alex:

Attached is a detailed, ten page response from Larry Stewart to your fourth demand for the same information. Mr. Stewart has now completely answered your requests for documents on more than one occasion. He has no further documents to provide. Despite your threat to file a motion on this issue, there can be no sensible order that compels Mr. Stewart to produce items he has repeatedly told you he does not have. Our agreement was to provide you documents that he relied on in forming his opinions. He has done so, completely.

Dean Boland.

--  
Dean Boland  
Owner/Member  
Boland Legal, LLC  
1475 Warren Road  
Unit 770724  
Lakewood, Ohio 44107  
216.236.8080 ph  
866.455.1267 fax  
[dean@bolandlegal.com](mailto:dean@bolandlegal.com)

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.