
Burson-Marsteller Subpoena

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Date: December 7, 2011 4:22:38 PM EST

To: "Robert Ekstrand" <rce@ninthstreetlaw.com>

Subject: RE: Burson-Marsteller Subpoena

I am available to discuss the subpoena on Tuesday next week. Feel free to contact me in the afternoon. I will be in depositions the remainder of the week. We still do not know whether we have any documents. This project was short term as you know and quite some time ago. It requires going back and searching the files of certain employees no longer with the company and others who may not have any relevant documents.

I am also told that the Court has limited the discovery significantly and that this subpoena goes well beyond. I am happy to discuss with you in an effort to minimize our burden and narrow the scope of the subpoena.

Jesse

