

From: David Curcio [mailto:dcurcio@blhc-law.com]

Sent: Friday, April 13, 2007 12:33 PM

To: akbruster@nixlawfirm.com

Subject: RE: DTC - proposed conference

Attached is a *draft* of a summary of the documents which address your questions; the actual redacted documents will be sent to you. Based on your e-mail and DTC's prior briefing and position on jurisdictional discovery, I will file the motion as "opposed."

-----Original Message-----

From: Anthony Bruster [mailto:akbruster@nixlawfirm.com]

Sent: Thursday, April 12, 2007 3:50 PM

To: dcurcio@blhc-law.com

Cc: 'DataTreasury'; 'Nick Nicholas'

Subject: FW: DTC - proposed conference

Importance: High

David:

I'm trying to understand the issue here. You are seeking Court protection to avoid having to produce documents the Court has already ordered you to produce, on the grounds that the content is irrelevant? Please advise as to what the general nature of the contents you seek to redact, why you believe it to be irrelevant, what specific dates / types of documents you seek to redact, and all other pertinent information for us to assess this request. I also want to ensure that we (i.e., ya'll) satisfy the demands of the Protective Order for our meet and confer. We look forward to hearing from you.

AKB

From: David Curcio [mailto:dcurcio@blhc-law.com]

Sent: Thursday, April 12, 2007 3:18 PM

To: datatreasury@cooperiplaw.com

Cc: 'Maryellen Shea'; 'Nick Nicholas'

Subject: FW: DTC - proposed conference

Importance: High

Dear Counsel for Plaintiff DataTreasury Corporation: I am writing to confer on a motion for protection we are filing on behalf of HSBC. The motion seeks to protect from discovery some of the content of the documents subject to the March 15, 2007 Order, based on the assertion that the redacted content is irrelevant to the narrow issue identified by the Court and is highly sensitive and confidential. We will also seek the Court's permission to provide the unredacted documents for *in camera* review. Please allow this email to serve as our conference requirements under the local and Federal rules, and kindly advise whether or not you oppose the Motion for Protection. *I will assume that you **oppose** the motion, unless you advise otherwise by 2:00 p.m. on Friday, April 13, 2007.*

David S. Curcio

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