

# EXHIBIT B

## Tim Gavin

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**From:** Tim Gavin  
**Sent:** Wednesday, August 22, 2012 10:55 AM  
**To:** 'Steig Olson'  
**Subject:** RE: Subpoena on HP

I should have included that. Yes, we will not raise the discovery deadline as a basis for objection. I am glad we have reached agreement and look forward to working cooperatively in dealing with these discovery issues. Tim

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**From:** Steig Olson [mailto:steigolson@quinnemanuel.com]  
**Sent:** Wednesday, August 22, 2012 10:16 AM  
**To:** Tim Gavin  
**Subject:** RE: Subpoena on HP

Tim: This is generally fine on the understanding, as we discussed yesterday, that your client won't raise the fact discovery deadline (currently, September 14) as the basis for any objection.

Steig

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**From:** Tim Gavin [mailto:tgavin@CCSB.com]  
**Sent:** Tuesday, August 21, 2012 11:33 AM  
**To:** Steig Olson  
**Subject:** Subpoena on HP

Steig, this is to confirm our conversation of this morning. I am representing HP in responding to the subpoena you served upon it on August 10. I believe the documents that are of interest to you are going to be down here at the Plano facility, which is how your subpoena has made it back down to Texas. I need some time to talk to the right business people down here and determine what we have, what we can produce, and what we would need to object to. I know for sure that your first request is objectionable, as it seeks all documents regarding contracts between HP and EDS and there will be contracts totally unrelated to the matters that are of interest to you. The rest I need to figure out. So what I have proposed is that you give me an extension until September 5 to figure out what all we have and try to work things out with you, with a view toward actually producing documents on September 19. If things can't be worked out, then I would file my objections and whatever motion I would need to file by September 5. Look forward to working through these issues with you. Tim

**Tim Gavin**  
*Partner*



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