

**Lee, Gary**

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**From:** Gordon, Jack B. [GordoJa@ffhsj.com]  
**Sent:** Monday, February 07, 2005 11:44 AM  
**To:** Lee, Gary  
**Subject:** RE: Equitas

Gary: Because we don't believe the documents are relevant, I was not intending to undertake the burden of a privilege log. Jack.

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

**From:** Lee, Gary [mailto:Gary.Lee@lovells.com]  
**Sent:** Monday, February 07, 2005 11:35 AM  
**To:** 'Gordon, Jack B.'  
**Subject:** RE: Equitas

Jack, we will have to agree to disagree with your position on the relevance and privilege issues. Will you also be producing a privilege log?

Regards,

Gary S. Lee  
Lovells  
900 Third Avenue  
New York, N.Y. 10022  
Tel. (212) 909-0604  
Fax. (212) 909-0666  
E.mail: gary.lee@lovells.com

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

**From:** Gordon, Jack B. [mailto:GordoJa@ffhsj.com]  
**Sent:** Monday, February 07, 2005 11:26 AM  
**To:** Lee, Gary  
**Subject:** RE: Equitas

Gary:

We remain prepared to produce in accordance with my December 28 letter. We continue to object to internal documents and communications among the AFIA cedents. We do not believe such documents are relevant. Moreover, they are privileged.

I am in Europe this week on other matters and will be back in the US next Monday. I'll work on getting you the producible documents when I return.

Jack.

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

**From:** Lee, Gary [mailto:Gary.Lee@lovells.com]  
**Sent:** Monday, February 07, 2005 9:20 AM  
**To:** 'Gordon, Jack B.'  
**Subject:** RE: Equitas

Jack, please let me know where this now stands.

Regards,

Gary S. Lee  
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E.mail: gary.lee@lovells.com

-----Original Message-----  
From: Gordon, Jack B. [mailto:GordoJa@ffhsj.com]  
Sent: Thursday, January 27, 2005 5:23 PM  
To: Lee, Gary  
Subject: RE: Equitas

OK. I'll get back to you.

-----Original Message-----  
From: Lee, Gary [mailto:Gary.Lee@lovells.com]  
Sent: Thursday, January 27, 2005 5:23 PM  
To: 'Gordon, Jack B.'  
Subject: RE: Equitas

Jack. You have it exactly right - the disagreement at this point is limited to (i) internal documents and (ii) communications between the AFIA cedents regarding the subjects in paragraphs 1 & 2.

Regards,

Gary S. Lee  
Lovells  
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-----Original Message-----  
From: Gordon, Jack B. [mailto:GordoJa@ffhsj.com]  
Sent: Thursday, January 27, 2005 4:25 PM  
To: Lee, Gary  
Subject: RE: Equitas

Gary: I'm slightly confused by your letter. By "the requested documents (in addition to the documents listed in paragraph 1)," do you mean the documents in paragraph 4 as well? Or is our disagreement at this point limited to internal documents and communications between the AFIA cedents regarding the subjects in paragraphs 1 & 2? Jack.

-----Original Message-----  
From: Lee, Gary [mailto:Gary.Lee@lovells.com]  
Sent: Thursday, January 27, 2005 4:01 PM  
To: 'Gordon, Jack B.'  
Subject: Equitas

Confidential  
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Please see attached.

Gary S. Lee  
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