## EXHIBIT 1

Gary S. Lee Lovelis 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: Lee, Gary

Sent: Friday, May 20, 2005 12:59 PM

To: Lee, Gary; 'Gordon, Jack B.'

Cc: 'Andre Bouffard' Subject: RE: Ace/Home

Jack, one other thing. The handwritten notes are mostly illegible. To save time can I ask that you produce a typewritten version in advance of the deposition. Otherwise, we would have to ask Mr. Williams to read everything into the record and that will impair any chance we have to finish him in one day.

## 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: Lee, Gary

Sent: Friday, May 20, 2005 12:03 PM

To: 'Gordon, Jack B.'

Cc: Lee, Gary; Andre Bouffard

Subject: RE: Ace/Home

Jack.

We are in receipt of the "supplemental" production by Equitas. In order to determine whether that production is consistent with and indeed complies with the Order of May 12, 2005 (and without waiving Equitas' jurisdictional objection), please provide us with the following confirmations:

- 1. Equitas has produced all documents relied upon (as the Court explained that term) in devloping Mr. Williams' Affidavit.
- 2. The redactions in the original and supplemental production do not form part of the information Mr. Williams relied upon in developing his affidavit.
- 3. All internal Equitas documents relating to the subject matter of Mr. Williams affidavit have been produced - we have seen nothing apart from Mr. Williams notes.
- 4. All external advice received by Equitas relating to the subject matter of Mr. Williams affidavit have been produced - we saw nothing in what you produced.

Regards,

Gary S. Lee Lovelis 900 Third Avenue New York, N.Y. 10022 Tel. (212) 909-0604 Fax. (212) 909-0666

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5/24/05