

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: Thursday, May 26, 2005 10:23 AM
To: Lee, Gary
Cc: Andre Bouffard; EAS@Rackemann.com
Subject: RE: Ace/Home

Gary:

Equitas has produced all documents called for by the Order/Guidelines. In producing, we used the expansive definition of "relied upon." The redactions do not form a part of the information Mr. Williams relied upon.

Jack.

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

From: Lee, Gary [<mailto:Gary.Lee@lovells.com>]
Sent: Friday, May 20, 2005 12:03 PM
To: 'Gordon, Jack B.'
Cc: Lee, Gary; Andre Bouffard
Subject: RE: Ace/Home

Confidential

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 developing Mr. Williams' Affidavit.

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

Lovells is an international law firm.

CONFIDENTIALITY. This email and any attachments are confidential and may also be privileged. If you are not the named recipient, please do not disclose the contents to another person, use this email for any purpose or store or copy the information in any medium. Instead, please notify the sender by return email and delete this email (including any attachments) from your system.

Confidentiality Notice: The information contained in this e-mail and any attachments may be legally privileged and confidential. If you are not an intended recipient, you are hereby notified that any dissemination, distribution or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please notify the sender and permanently delete the e-mail and any attachments immediately. You should not retain, copy or use this e-mail or any attachment for any purpose, nor disclose all or any part of the contents to any other person. Thank you .