

From: Shannon Holliday
Sent: Tuesday, October 19, 2010 5:17 PM
To: 'Barak.Cohen@usdoj.gov'; 'Eric.Olshan@usdoj.gov'
Cc: 'Joe Espy'; Bobby Segall; fgray@qlsmgn.com; Walter McGowan; Ben Espy; Bill Espy; David Martin; 'Sam Heldman'
Subject: Documents - Response from McGregor Counsel

Barak,

I am writing to respond to your email to Joe Espy and other lead counsel about the documents. Your email is copied below this email for your reference.

US-FIN 00000001 to US-FIN 00054734 is corrupted. We could not open the vast majority of the files. Please provide the actual files in a format that is accessible.

Disc 1 of 5 is corrupted. We could not open the vast majority of the files. Please provide the actual files in a format that is accessible.

Disc 4 of 5 has two shortcuts (to a zip file and a Quickbooks data file). The actual files are not present. (Someone copied the shortcuts, not the data.) Please provide the actual data intended for this disc.

Finally, please tell us about the hard-drive we provided last week. I am assuming, since we have not heard from the government, that the hard drive is going to be used for the discovery that is to be provided this Friday. But no one has communicated that to us. Please let me know.

Sincerely,

Shannon Holliday

Dear Counsel:

Following last week's arraignment, we provided to each defendant 19 disks containing initial disclosures. If you did not receive all 19 disks or are experiencing problems accessing data on any of them, please let us know as soon as practicable.

Note also that the discovery provided last week included a series of four disks labeled in sequence from "disk 1 of 5" through "disk 5 of 5," excluding "disk 3 of 5," which was not provided. A series of disks containing the data that would have comprised "disk 3 of 5" will be produced this Friday, October 22, 2010.

Very truly yours,

Barak Cohen