

**Exhibit B:**

**Management Defendants' Response  
to Litigation Hold Letter**

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September 25, 2013

VIA EMAIL AND FIRST CLASS MAIL

William E. Davis, Esquire  
Foley & Lardner LLP  
One Biscayne Tower  
2 South Biscayne Boulevard  
Suite 1900  
Miami, FL 33131-2132

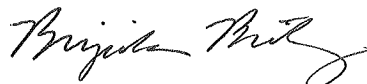
Dear Mr. Davis:

I am in receipt of your letter dated September 17, 2013, titled "Steptoe Litigation Hold Letter," which purports to advise my clients and me of our legal and ethical obligations and also appears designed to intimidate, threaten and harass. This is the first communication I have received from you in this case. While I was not expecting flowers, I had hoped for civil and cordial communications.

I will continue to advise my clients as appropriate and, as always, will abide by my legal and ethical obligations. To be clear, I am not agreeing to or accepting any of your definitions, interpretations or requests. At the appropriate time, if we reach discovery in this case, you can serve discovery requests and those will be responded to in due course.

If this is unclear to you, please feel free to contact me.

Sincerely,



Brigida Benitez