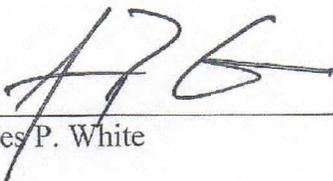


the location of e-mails, including stored and archived e-mails, could not reasonably be completed in a few days.

5. Before any responsive e-mails could be produced, they would have to be reviewed for privileged or confidential information. It would be ethically inappropriate and legal malpractice for counsel to allow e-mail of that volume to be produced without review. It is not reasonably possible, even if the e-mails could be assembled, for counsel to review the e-mails for privileged or confidential information in a few days.

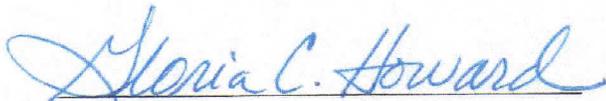
Dated this 17th day of April, 2015.



James P. White

Subscribed and sworn to before me

this 17th day of April, 2015.



Notary Public – Texas
My commission expires:

