

EXHIBIT B

LAW OFFICES OF

SLK

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May 20, 2008

Sent via e-mail

Eric P. Schroeder, Esq.
Powell Goldstein LLP
1201 West Peachtree Street, NW
14th Floor One Atlantic Center
Atlanta, GA 30309-3488

Re: STERN V. O'QUINN
Our File No: 07-9616

Dear Eric:

First of all, I did want to let you know that a fair amount of the responses to your discovery requests should be available by the end of this week. However, a substantial amount of the materials that you have sought from Wilma Vicedomine and Don Clark clearly qualify as work product. As such, I do not believe that I am obligated to provide a privilege log with regard to that documentation, to the extent that categories of information requested reflect that they would qualify as privileged documentation, on their face.

In accordance with existing case law, a privilege log would potentially breach the work product privilege merely through the identification of specific documentation. I therefore believe that we have the prerogative of registering general objections to the production of privileged information by identifying those specific categories of information which are subject to objection. Obviously, if you have any case law to the contrary, I would like to see it promptly.

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We also plan on filing a Motion for Protective Order with regard to some of the documents requested from Ms. Vicedomine. While she is not an employee of the Firm, she was asked to perform certain tasks for the Firm. That work product would also be subject to the same claims of privilege. Under the circumstances, the Motion for Protective Order which we are anticipating will object to her production of any documentation which falls within the work product privilege. Here again, however, I do not believe that it is appropriate to request a privilege log with regard to that documentation, given the fact that the categories of documentation requested clearly demonstrate that the information sought is privileged.

According to the rules, we have 30 days to object to a third party subpoena that would violate the work product privilege. While we are attempting to prepare a Motion for Protective Order, and will try to file that before next Friday, I am concerned that the timing of the subpoena does not allow the 30 days that is contemplated by the rules for this type of objection and motion. I nevertheless felt that it would be important to let you know that we are going to advise Ms. Vicedomine's counsel that we are asserting the work product privilege with regard to certain categories of information that you have requested by way of the subpoena.

I also do not believe that it is appropriate to serve a Notice of Deposition at this late date upon Ms. Vicedomine "in her capacity as a current or former investigator, agent, employee, etc" of Mr. O'Quinn or the Firm. Here again, we are not being given sufficient time to register appropriate objections, pursuant to the Rules of Civil Procedure. I don't believe that you can obviate those concerns by merely recasting your Notice of Deposition in this format, some 10 days before the deposition itself. We will nevertheless attempt to address that in a formal motion.

On a final note, please let me know if we can work out some kind of proposed confidentiality/ non-distribution order with regard to the pending depositions. I would like to avoid a media frenzy.

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STEPHENS LYNN KLEIN
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I will try to speak to you about all of this at some point later this afternoon.

Very truly yours,

/ s / (e-mail transmission)

ROBERT M. KLEIN

RMK/dml

cc (by e-mail): Neil McCabe, Esq.
John O'Quinn, Esq.
Reagan Pratt, Esq.
Don Clark
Houston S. Park, Esq. (in the Firm, WPB office)
Roberta Mandel, Esq. (in the Firm)
Lucy Marques, Paralegal (in the Firm)

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