

Cliff, Scott and Kathleen,

Sorry for the short notice, but we have been working with a trial consultant named Wil Frank on our NAFTA case over the past several weeks, and we have been very impressed with him. He is here in the office today and would be available to meet with you if you are interested for 15 minutes or so following the partners lunch.

From my limited experience with him, what he does is handle hundreds of electronic exhibits and PowerPoint slides for use with direct testimony and trials and for opening and closing arguments. We retained him and he appeared here just days before our NAFTA arbitration commenced, and he seamlessly integrated himself into our entire trial presentation. It went very well, and without Wil we would have been struggling. In a matter of days he became familiar with many hundreds of electronic documents and exhibits, understood much of their context and significance in the issues in the case, and prepared manipulations of those exhibits which he operated during the trial hearing. Wil was incredibly dedicated during the 6 days of the evidentiary hearing, operating nearly around the clock with minimal sleep.

Tim