

February 20, 2003

Steven W. Leary, Esq.  
95 State Street  
Springfield, MA 01103

**RE: Marcia Rhodes, et al. v. Driver Logistics, et al.**  
***Norfolk Superior Court, Civil Action No.: 02-01159A***

Dear Steve:

I understand that you are on vacation this week and are presumably enjoying much better weather in the Bahamas than we have experienced here.

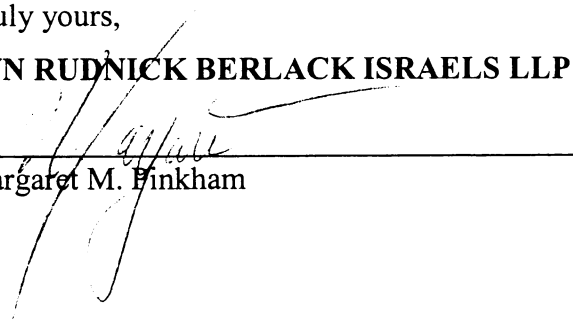
I am following-up on my January 21, 2003 letter to you in which I confirmed my understanding that you were going to provide me with factual information supporting your claim that Mrs. Rhodes' request for production of documents # 20 (which was incorrectly referred to as Request # 29 in my last letter) is overly broad and unduly burdensome. As we discussed last month, since I have no understanding of the number of Driver Logistics' employees who are assigned to drive routes for GAF, or any other information by which I could agree to reasonably narrow the scope of my request to perhaps a geographic region, I must again request that you produce responsive documents.

In addition, Carlo Zalewski has failed to respond at all to the document requests or produce any documents, including any personal insurance policies that may have covered him while he was driving vehicles owned by another person. I see little utility in moving to default Mr. Zalewski for failing to respond to the discovery request, and as you are the only attorney who has entered an appearance on his behalf, I would appreciate your assistance in this regard.

I look forward to hearing from you on the status of your clients' document production.

Very truly yours,

**BROWN RUDNICK BERLACK ISRAELS LLP**

By:   
Margaret M. Pinkham

MMP/jgh

cc: M. Frederick Pritzker, Esq.  
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