

# ROBINSON & COLE LLP

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*Via Facsimile Only*

December 1, 2005

Margaret M. Pinkham, Esq.  
Brown, Rudnick Berlack Israels LLP  
One Financial Center  
Boston, MA 02111

Re: Marcia Rhodes, Harold Rhodes, et al. v. AIG Domestic Claims, Inc. et al.  
Suffolk Superior Court Civil Action No. 05-1360-BLS

Dear Margaret:

As I explained when we spoke this afternoon, defendant Zurich American Insurance Company has located an additional document that is responsive to Plaintiffs' Document Request No. 3. Because this document contains sensitive commercial and proprietary information belonging to third-party administrator Crawford & Company, however, we will only produce it in this action subject to a confidentiality agreement. I have attached a proposed Confidentiality Agreement for your review. I assume you will agree to its terms, but please confirm that with me as soon as possible. Upon receipt of the executed Agreement from your office, we will produce the additional document.

In light of Zurich's agreement to produce this document subject to a Confidentiality Agreement, and based on our discussion this afternoon, I understand that you are withdrawing Plaintiffs' Second Motion to Compel. If your intention is otherwise, however, please let me know that by tomorrow morning so that we may have sufficient time to finalize our opposition.

Finally, as you know, we wish to inspect the documents that Plaintiffs' previously made available to counsel for National Union in response to its Request for Production of Documents. We would prefer to conduct this inspection at your office on December 8, 2005. Please advise whether that date is convenient.



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**ROBINSON & COLE<sub>LLP</sub>**

Margaret Pinkham, Esq.  
December 1, 2005  
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Very truly yours,

A handwritten signature in black ink, appearing to read "Gregory P. Varga", with a long horizontal flourish extending to the right.

Gregory P. Varga

Copy to: Danielle Andrews Long, Esq.

