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June 8, 2005

**VIA FACSIMILE & REGULAR U.S. MAIL**

James A. Wilson, Esq.  
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52 East Gay Street, P.O. Box 1008  
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Re: Buckeye Diamond Logistics, Inc. (fka Buckeye Recyclers, Inc.) v. CHEP USA  
U.S. District Court for the Southern District of Ohio, Western Division, Case No.  
C3-01-440

Dear Jim:

I am writing in response to your letter from earlier today regarding clarification with respect to the source documents for DX 26, DX 27, and DX 28. With respect to DX 26 and as I indicated in my June 6, 2005 letter, the cost of pallet information is derived from the information in DX 25. The residual depreciation is from CHEP's depreciation methodology, to which Elton Potts will testify. There are no separate documents that explain the methodology.

With respect to DX 27, the number of pallets is a stipulated number. The average monthly depreciation is based on the numbers set forth in DX 26. The calculations to which Elton has and will testify are not "simply mental calculations." However, any worksheets or other documents that Elton prepared solely for litigation or for legal counsel's benefit regarding his calculations are subject to the attorney-client and work product privileges and will not be produced. We are not aware of any documents that exist regarding the calculations that would not be subject to the privileges.

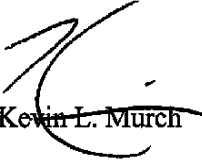
With respect to the calculations set forth in DX 28, we again take the position that any worksheets or other documents that were prepared solely for litigation are privileged. However, in my June 6, 2005 letter, I inadvertently failed to address the historic ratios contained on the second page of that exhibit. That information was taken from CHEP10764, CHEP11622-23, and CHEP11629-32. In reviewing those documents, I noticed that the historic wash rate is .8%, not 8% as indicated in DX 28. Therefore, we will revise DX 28 accordingly and forward the revised version to you.

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I trust this fully answers your questions. Should you have any additional questions, do not hesitate to contact me.

Very truly yours,



Kevin L. Murch

c: John C. McDonald, Esq.



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