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June 6, 2005

VIA FACSIMILE & REGULAR U.S. MAIL

James A. Wilson, Esq.
Vorys, Sater, Seymour & Pease
52 East Gay Street, P.O. Box 1008
Columbus, Ohio 43216-1008

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 previous requests for information regarding the source documents relied upon in preparing DX23, DX24, DX25, DX26, DX27, DX28, DX29, DX30, DX31A, DX31B, DX33, DX34, and DX35. I believe the following should provide you with the information you requested.

DX23: The information in the exhibit is based on the stipulation that in September 2003, Buckeye returned 15,981 CHEP pallets to CHEP and prior to that date, Buckeye sent 11,414 CHEP pallets to its customers. Because Buckeye cannot provide any information as to when it received the pallets, CHEP estimated the approximate monthly average at which Buckeye would have received CHEP pallets. As explained by Elton Potts in his deposition testimony, the monthly average was calculated based on the information set forth in DX24.

DX24: The number of pallets returned to CHEP by Buckeye was taken from the bills of lading identified in the exhibit. The bills of lading are contained in DX 20.

DX25: The information contained in the exhibit was taken from CHEP 10809 through CHEP 10812.

DX26: The cost of pallet information is taken from the number calculated in DX25. The annual and monthly depreciation values are based on calculations about which Elton Potts has testified.

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DX27: This exhibit contains calculations based on the numbers set forth in the preceding exhibits. Elton Potts has testified regarding the exact calculations.

DX28: The information in this exhibit relates to the costs associated with the repair and replacement of the pallets recovered from Buckeye in September 2003. The information supporting these numbers can be found in the exhibits marked during Derrick Smith's deposition. Additionally, it is anticipated that Mr. Smith will testify to the numbers and calculations contained in the exhibit.

DX29: The numbers contained in this exhibit come from calculations set forth in the preceding exhibits.

DX30: This exhibit is a summary of the damages calculated in the preceding exhibits (except for sales by Buckeye, which is a stipulated number).

DX31A: We anticipate updating this exhibit and will provide source information at that time.

DX31B: We anticipate updating this exhibit and will provide source information at that time.

DX33: This is a demonstrative exhibit showing the presence of CHEP pallets in the United States. It is not a summary of other documents. We anticipate that Elton Potts will testify about the information contained in this exhibit.

DX34: This is a demonstrative exhibit to show the differences between the different types of pallets that would be discussed during the trial. It is not a summary of other documents. We anticipate that Elton Potts will testify about the information contained in this exhibit.

DX35: This is a demonstrative exhibit to show the progression of the CHEP Recovery Program. This is not a summary of other documents. We anticipate that Elton Potts will testify about the information contained in this exhibit.

Additionally, with respect to your remaining questions regarding the numbers included under the "others in" and "others out" categories in CHEP's Dwell Time/Cycle Time Calculations previously produced to Buckeye, CHEP reviewed the data that was available to determine from where those figures originated. There is no data available for the bulk of those transactions. CHEP did find comments concerning the following transactions:



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| CHEP Period | Commercial Name | Others In | Others Out | Comments |
|-------------|-------------------|-----------|------------|--|
| Feb-00 | Abbott Foods | 19 | 1,577 | Transfer for prior returns not properly credited at service center |
| Jul-03 | Abbott Foods | (1,741) | 6,979 | Audit adjustments (stock take) due to conversion onto the CHEP program |
| Sep-03 | Abbott Foods | (19) | 327 | Audit adjustments (stock take) |
| Oct-99 | Big Lots/Odd Lots | 0 | 2,911 | Inventory adjustment due to Big Lots locations consolidation |
| Nov-99 | Big Lots/Odd Lots | 0 | 13,177 | Inventory adjustment due to Big Lots locations consolidation |
| Dec-99 | Big Lots/Odd Lots | 0 | 2,355 | Inventory adjustment due to Big Lots locations consolidation |
| Feb-00 | Big Lots/Odd Lots | 0 | 629 | Inventory adjustment due to Big Lots locations consolidation |
| Apr-00 | Big Lots/Odd Lots | 0 | 5,438 | Inventory adjustment due to Big Lots locations consolidation |
| Jul-00 | Big Lots/Odd Lots | 0 | 3,804 | Inventory adjustment due to Big Lots locations consolidation |
| Jun-01 | Big Lots/Odd Lots | 338 | 21,144 | Inventory adjustment due to Big Lots locations consolidation |
| Aug-01 | Big Lots/Odd Lots | 10,207 | 8,412 | Inventory adjustment due to Big Lots locations consolidation |
| Oct-01 | Big Lots/Odd Lots | 1,732 | 0 | Inventory adjustment: negative balance |
| Jan-02 | Big Lots/Odd Lots | 15,221 | 4,064 | Inventory adjustment due to Big Lots locations consolidation |
| Feb-02 | Big Lots/Odd Lots | 1,449 | 2,850 | Inventory adjustment due to Big Lots locations consolidation |



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| | | | | |
|--------|-------------------|----|-------|---|
| Mar-02 | Big Lots/Odd Lots | 64 | 49 | Inventory adjustment due to Big Lots locations consolidation |
| Jun-02 | Big Lots/Odd Lots | 37 | 2,623 | Inventory adjustment due to Big Lots locations consolidation |
| Jun-04 | Big Lots/Odd Lots | 0 | 9,022 | PD to PD transfer; Consolidation of Big Lot store locations listed at the same location both PD's |

This is all of the information that CHEP has on file regarding these transactions.

Please call me should you have any questions.

Very truly yours,



Kevin L. Murch

c: John C. McDonald, Esq.



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