



March 26, 2004

Via Hand-Delivery

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. (formerly Buckeye Recyclers, Inc.) v. CHEP USA*
U.S. District Court for the Southern District of Ohio Western Division
Case No. C3-01-440 - Judge Walter Herbert Rice

Dear Jim:

Enclosed hereunder please find CHEP 10967-10970.

Originally Keith Norder and his staff had primary responsibility for managing the collection and searching for responsive documents. As you know, Keith has been replaced and his replacement went through the steps of again attempting to locate the author of CHEP 00795. Fortunately, he was more successful on the quest and just yesterday he located the author of the document and the additional documents (enclosed hereunder).

The author of CHEP00795 (and the documents enclosed hereunder) is Glen Kolb. Mr. Kolb will be made available for deposition here in our Columbus office at a mutually agreeable date and time. Please provide me with proposed dates.

In addition, we will be reviewing all of your prior document requests with Mr. Kolb to make sure that there are no additional responsive documents.

I believe that this discovery renders the affidavit referred to during the conference with the court unnecessary.

Yours very truly,

A handwritten signature in cursive script that reads "Bridgette C. Roman".
Bridgette C. Roman

BCR/bnb
Enclosures