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July 16, 2002

Via Facsimile

Michael D. Poulos
Michael D. Poulos, P.C.
1724 Sherman Avenue
Evanston, Illinois 60201

Re: *Choi v. Keeler, et al.*
No. 02 CH 4053

Dear Mr. Poulos:

This letter is in response to your letter inadvertently dated July 11, 2002 (and received July 15, 2002), which addressed the confidentiality and removal of certain portions of exhibits attached to your Response to Defendant Trustee's Motion for Summary Judgment. It also follows our conversation today. While you have agreed to redact the portions of Exhibits A and G labeled "legal," we want the following exhibits or portions deemed confidential and immediately redacted and/or immediately sealed:

(1) Exhibit A. You have agreed to redact the "legal" portion of this exhibit, which contains attorney/client privileged information regarding currently pending litigation. As to the rest of Exhibit A, these are notes of the minutes of a Foundation Board meeting and are therefore confidential and should be filed under seal pursuant to a protective order.

(2) Exhibit B. The paragraph beginning with "Regarding the addition of" contains attorney/client privileged information and should be redacted.

(3) Exhibit C. Item 1 of this exhibit contains attorney/client privileged information and should be redacted.

(4) Exhibit E. This entire exhibit contains communications protected by the attorney/client privilege and is irrelevant to this case and should be redacted.

(5) Exhibit G. You have agreed to redact the "legal" portion of this exhibit, which contains attorney/client privileged information. In addition, Section 3 identifies individuals

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involved in translating the Urantia Book and is confidential, irrelevant to this case, and should be redacted. Furthermore, as to the rest of Exhibit G, these are notes of minutes of a Foundation Board meeting which contain information regarding fundraising, financial information and policies and procedures. This information is also irrelevant to this case confidential and should be redacted, or alternatively, filed under seal pursuant to a protective order.

I advised you in our conversation that in light of the Confidentiality Agreement we have previously provided to you, we intend to request tomorrow that the Court seal the entire file pending determination of what information is deemed confidential under the Confidentiality Agreement and should thus be subject to a protective order. You have advised that you will not agree to such an order. I further advised you that we will file an emergency motion for protective order which addresses the attorney/client information contained in Exhibits A and G (agreed), as well as our request that additional information identified above be redacted and or filed under seal and that the Court seal the entire file pending a determination of what information is confidential under the Confidentiality Agreement and should be filed under seal pursuant to a protective order.

Pursuant to your request, the emergency motion will be sent to you and to Mark Hellner. It will be set for 10:00 a.m. tomorrow.

Very truly yours,



Wallace C. Solberg

WCS/lcs

cc: Michael J. Hayes, Esq.
S. Patrick McKey, Esq.
Mark Hellner, Esq. (via e-mail)

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