

**Andrew Winton**

**From:** Jeff C. Hopkins <jhopkins@grosman.com>  
**Sent:** July-18-14 8:36 AM  
**To:** Andrew Winton  
**Cc:** Rocco DiPucchio; 'Andy Pushalik'  
**Subject:** RE: Conflict Check [IWOV-CLIENT.FID45653]

We are fine with removing the confidentiality clause.

I will relay your other 2 requests, along with your earlier requests re: software.

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Jeff C. Hopkins  
 Partner

GROSMAN, GROSMAN & GALE LLP



Employment & Labour  
 Lawyers

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**From:** Andrew Winton [<mailto:awinton@counsel-toronto.com>]  
**Sent:** Friday, July 18, 2014 12:28 AM  
**To:** Jeff C. Hopkins  
**Cc:** Rocco DiPucchio; 'Mitchell, Jeff ([jeff.mitchell@dentons.com](mailto:jeff.mitchell@dentons.com))'; 'Andy Pushalik'  
**Subject:** RE: Conflict Check [IWOV-CLIENT.FID45653]

Jeff,

In the scope of services, paragraph 1(a), we cannot accept the vagueness of the phrase “created using industry standard tools and methodologies”. They need to be more specific. There are three devices – a laptop, an iPad and a phone. For each device, H&A needs to specify what tools and methodologies they will use to take the forensic image before they start working so we can verify that the tools and methodologies meet our requirements.

Second, H&A needs to clarify what they mean by a “working copy” in the context of an iPad and smartphone.

Finally, the confidentiality clause should be struck in its entirety. All communications between Grosman, Grosman and Gale and H&A and any work-product of H&A relating to this retainer should be made available to us at our request.

Subject to these concerns, we are satisfied with the retainer.

Regards,

Andrew

**Andrew Winton**  
 Direct: (416) 644-5342

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**From:** Jeff C. Hopkins [<mailto:jhopkins@grosman.com>]  
**Sent:** July-17-14 10:21 PM  
**To:** Jeff C. Hopkins  
**Cc:** Rocco DiPucchio; Andrew Winton; Mitchell, Jeff ([jeff.mitchell@dentons.com](mailto:jeff.mitchell@dentons.com)); Andy Pushalik  
**Subject:** Re: Conflict Check

Rocco / Andrew: please advise ASAP so I can confirm with H & A for Monday.

On Jul 17, 2014, at 4:03 PM, "Jeff C. Hopkins" <[jhopkins@grosman.com](mailto:jhopkins@grosman.com)> wrote:

Counsel:

Attached is the (draft) engagement letter for review. While our Firm would be retaining H&A, I'm advised that the invoicing clause has a provision under which we would instruct H&A to redirect billing to Catalyst. I have not yet relayed Andrew's imaging requests, but I don't anticipate any issues.

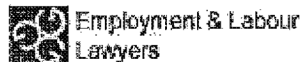
The imaging can be conducted (and I assume completed) on Monday, July 21. Given the need to complete the imaging prior to Mr. Moyle reviewing any Catalyst documents on his computer devices, we cannot commit to delivering the AOD on Tuesday, July 22. However, we should be able to deliver the AOD on the 23<sup>rd</sup>.

Once I receive your confirmation that the engagement letter is agreeable, I will confirm with H&A for Monday.

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Jeff C. Hopkins  
Partner

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**From:** Harold Burt-Gerrans [<mailto:HBurt-Gerrans@haediscovery.com>]  
**Sent:** Thursday, July 17, 2014 2:55 PM  
**To:** Jeff C. Hopkins  
**Subject:** RE: Conflict Check

Good Afternoon Jeff

Please find attached the Letter of Engagement for the B. Moyle matter. Please return the executed copy via fax or email at your earliest convenience.

Thank-you for retaining us on this matter. I look forward to working with you and your team.

Regards,  
Harold

Harold Burt-Gerrans

Director of Litigation Services | H&A eDiscovery | 2680 Matheson Blvd. E., Suite 204, Mississauga ON, L4W 0A5  
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<image001.png>

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<H&A Letter of Engagement - B. Moyse - 2014-07-17.pdf>