

Andrew Winton

From: Jeff C. Hopkins <jhopkins@grosman.com>
Sent: July-18-14 8:54 AM
To: 'Harold Burt-Gerrans'
Cc: Andrew Winton; Rocco DiPucchio; Pushalik, Andy (andy.pushalik@dentons.com)
Subject: RE: Conflict Check

Morning Harold:

The engagement letter has been reviewed by each party. Catalyst's legal counsel has the following comments / requested additions to the letter. (Mr. Andrew Winton who is cc'd on this email along with counsel to West Face).

1. The image must be taken of the entire drive (physical) and done in an E01 format. It is their understanding that "Encase" and "FTK imager" are capable of creating E01 images.
2. The scope of services, paragraph 1(a), "created using industry standard tools and methodologies", needs to be more specific (i.e., reference the three devices – a laptop, an iPad and an android phone. For each device, H&A needs to specify what tools and methodologies they will use to take the forensic image before it starts working so it can be verified that the tools and methodologies meet our requirements.
3. H&A needs to clarify what they mean by a "working copy" in the context of an iPad and smartphone.
4. Finally, the confidentiality clause should be removed (this is agreeable given the nature of the legal proceeding for which this activity is being conducted). 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 Catalyst and / or West Face upon request.

Lastly, with respect to Mr. Moyse's iPad, they ask that H&A consult with their technical consultant, Mr. Martin Musters (Director of Forensics at CFI -647 302 0067) about the software and steps H&A intend to use to image the device, as there are (apparently) some detailed technical issues surrounding iPad imaging. Please note that Mr. Musters is away next week, so hopefully you can reach out to him today.

If the above modifications to the letter are agreeable to H&A, please forward me a revised letter and I will sign and return immediately. For efficiency, if you have any questions regarding the above requests, please feel free to communicate directly with Mr. Winton via reply email, with all others cc.'d of course.

Mr. Moyse has confirmed he will be at our office by 10:00 am Monday with his three computer devices.

Jeff.

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. Moyse 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

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From: Jeff C. Hopkins [<mailto:jhopkins@grosman.com>]
Sent: Thursday, July 17, 2014 8:29 AM
To: Harold Burt-Gerrans
Subject: RE: Conflict Check

Hi Harold:

Look forward to receiving the engagement letter for review.

We're looking at 3 computer devices on Monday morning, at our office at 393 Bay St., Suite 2011 (Bay & Richmond).

Jeff C. Hopkins
Partner



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From: Harold Burt-Gerrans [<mailto:HBurt-Gerrans@haediscovery.com>]
Sent: Wednesday, July 16, 2014 5:14 PM
To: Jeff C. Hopkins
Subject: Conflict Check

Good afternoon Mr. Hopkins

As per our discussion, we have completed the conflict check for the Moyse matter. I will put together a letter of engagement for the project, which should be ready for tomorrow. Imaging can be done onsite or in our office on Friday or Monday.

Regards,
Harold

Harold Burt-Gerrans

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