

Continue to meet and confer with DOJ to define the scope of their document requests and to devise mutually acceptable means of meeting them without unnecessary expense; work with Port IT staff and the outside vendor on the most cost-effective means of identifying and providing electronic data to DOJ; coordinate among DOJ, Port, vendor and co-counsel on the logistics of producing electronic and other documents to DOJ.

Paralegal work in winnowing from many terabytes of data the information that is germane to the DOJ's investigation and in collecting, identifying, organizing and producing documents to DOJ; continue to address economics of imaging electronic media and analyze methods of reducing cost of same; attention to methods of avoiding expense related to privilege reviews by entering into appropriate "claw-back" protocols with the DOJ for any privileged material produced that is not germane to DOJ issues; continue to prepare and present recommendations re electronic data production methods to the Port and to DOJ to arrive at a continuing consensus on cost/benefit of potential approaches; continue to provide materials to DOJ in a "running production" and in a sequence that is acceptable to them.

Get feedback from DOJ on early productions, on possible scope adjustments to reduce the future material required to be produced; use the process of producing material as a basis for our own analysis of key issues in which DOJ is interested; make oral presentations to DOJ with respect to issues in which they have expressed interest; use the resulting dialog to provide the most germane follow-up information. As of the submission of this budget in the first part of May, significant progress has been made in this effort.

Review cases, attorney general opinions, federal regulations and other authorities on legal issues of interest to DOJ; analyze documents produced to DOJ relating to specific issues of interest to DOJ; attention to history, timing and origin of Port policies relating to procurement.

Continue to conduct interviews to get at facts relating to key issues and present the results to DOJ; (potentially) conduct joint interviews with DOJ and assist them in follow-up inquiries; coordinate with Port staff to assure timely and accurate responses; work with the DOJ to speed the resolution of the investigation while providing all requested material and seeking to assure that any presentations we make on specific issues are accurate and reflect an objective evaluation of the facts.

Keep the Commission fully apprised of the progress of the work; continue to update the proposed budget for review by Port staff and counsel to

assure continuing alignment with Port objectives and with the Port's obligations in connection with the DOJ's investigation.

To the extent requested by them, provide raw data we have collected to those engaged in the Internal Investigation to avoid duplicate requests for such data, and, if they request it, provide other results of our work while safeguarding the independence of that investigation. Meetings and discussions have taken place for the purpose of effecting such coordination.

In the event of uncovering evidence of potential fraud or criminal activity, disclose same to the Commission and DOJ and assist in developing responses that conform to the Port's obligations in such circumstances.

Work with POS counsel on coordinating work, priorities, communication with Port staff, budget issues, legal questions and nature and timing of participation in Commission Executive Sessions; work with Port CEO and POS Commission on nature, purpose and focus of coordination and cooperation with DOJ as the specific elements of that effort unfold.