



November 20, 2018

VIA ECF, E-MAIL AND FEDEX

Honorable Sean H. Lane
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004

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Re: Status Report Regarding the Fareportal Contested Matter
In re Airfasttickets, Inc., Case No. 15-11951

Dear Judge Lane:

Arent Fox LLP represents the Liquidating Trust of Airfasttickets, Inc. (the “Liquidating Trust”) and submits this status report in advance of the tenth status conference, scheduled for November 27, 2018 at 10:00 a.m. (the “Status Conference”), in the contested matter (the “Contested Matter”) between the Liquidating Trust and Fareportal, Inc. regarding the Liquidating Trust’s objections to Fareportal’s claim [Claim No. 86] (the “Fareportal Claim”). On November 27th, I will be in New York on an unrelated matter and intend on appearing at the Status Conference in person. What follows here is an attempt to objectively set forth the background of the parties’ disputes for the benefit of the Court.

More than nineteen months have passed since the Court entered its April 11, 2017 Order [ECF No. 301] (the “Fareportal Order”) deeming the adjudication of the Liquidating Trust’s objections to the Fareportal Claim to be a contested matter. Over this period, Fareportal has sought discovery in support of its claims against the Airfastticket’s (the “Debtor”) estate (the “Estate”) and other parties in multiple other forums. Chief among these were Fareportal’s attempt to obtain information which Fareportal asserts would, among other things, reveal evidence supporting the Fareportal Claim from the chapter 7 trustee (the “Travana Trustee”) in the Travana, Inc. bankruptcy case¹ (the “Travana Bankruptcy”). At several of the prior status conferences (of which nine have been held), Fareportal described its then ongoing negotiations with the Travana Trustee; however, since the last status conference (held in August 2018) the Liquidating Trust learned that Fareportal’s negotiations with the Travana Trustee have broken-down. While the Liquidating Trust recognizes and appreciates Fareportal’s efforts to move the case forward, to date Fareportal has yet to present any information supporting its claims.

¹ Pending in the Bankruptcy Court for the Northern District of California (Case No. 17-30373).

The Liquidating Trust has substantially completed its administration of the Estate. Besides the Contested Matter, the lone matter to be resolved (a fraudulent transfer action against American Express) appears to be nearing a consensual resolution. Given that it has now been more than two years since Debtor's chapter 11 plan of liquidation was confirmed, it is understandable that several of the Liquidating Trust's beneficiaries have expressed frustration with the lack of progress in the Contested Matter. Because of the substantial amount asserted in the Fareportal Claim, which if allowed in the minimum amount asserted would constitute nearly 14% of the allowed claims pool, the Liquidating Trust cannot make distributions until the Contested Matter is resolved.

The purpose of this status report is to provide the Court and the Liquidating Trust's beneficiaries with a written timeline of the Contested Matter's history and to encourage the Court to enter a scheduling order that will help shepherd the matter forward towards a conclusion (whether by stipulation or through litigation). The Liquidating Trust is open to providing any assistance to Fareportal's discovery efforts the Court deems appropriate. Fareportal, however, bears the ultimate burden of establishing the validity of its claim.

Timeline

On July 27, 2015, certain of the Debtor's creditors filed an involuntary petition against the Debtor seeking an order for relief under chapter 7 of the Bankruptcy Code,² which the Debtor subsequently consented to. On October 27, 2015, the Court entered an order [ECF No. 28] converting the Debtor's case to one under chapter 11 of the Bankruptcy Code (this "Chapter 11 Case").

On November 24, 2015, the Court approved the sale of substantially all of the Debtor's intellectual property, software and related assets to Travana under section 363 of the Bankruptcy Code [ECF 65] (the "Sale Order").

On February 26, 2016 the Court entered the *Order Granting Debtor's Motion Pursuant to 11 U.S.C. § 502(b)(9), Fed. R. Bankr. P. 2002 and 3003(c)(3), and Local Rule 3003-1 for Entry of an Order (i) Establishing Deadline for Filing Proofs of Claim and Procedures Related Thereto and (ii) Approving Form and Manner of Notice Thereof* [ECF No. 109] (the "Claims Bar Date Order"), which established April 6, 2016 (the "General Bar Date") as the deadline for parties to file general unsecured claims.

On July 11, 2016, the *Debtor's Chapter 11 Plan of Liquidation* was filed. On August 11, 2016, the Court approved the Debtor's disclosure statement [ECF No. 184].

² Title 11 of the United States Code.

On August 1, 2016, Fareportal initiated an action against Travana and Jason Ware (collectively, the “2016 Action Defendants”) in the Supreme Court of the State of New York, County of New York (Index No. 653995/2016) (the “2016 Action”) asserting claims of breach of contract, breach of fiduciary duty and duty of loyalty, misappropriation of trade secrets, unfair competition, aiding and abetting breach of fiduciary duty and various tortious interference claims against Travana and/or Ware. Upon information and belief, the 2016 Action remains pending.

On August 24, 2016, Fareportal filed its *Ex Parte Motion for an Order Authorizing Fareportal Inc. to (A) Conduct a 2004 Examination of Airfasttickets, Inc. and (B) Seek Related Document Production* [ECF No. 196] (“Fareportal’s 2004 Motion”). On September 23, 2016, the Court entered an Order [ECF No. 229] denying the relief sought in Fareportal’s 2004 Motion for reasons stated on the record during the hearing, held on September 14, 2016, including the Debtor’s lack of ongoing operations, the Debtor’s sale of all relevant information (including the Debtor’s source code) and Fareportal’s ongoing litigation with Travana.

On October 3, 2016, 180 days after the General Bar Date, Fareportal filed the Fareportal Claim [No. 86]. A copy of the Fareportal Claim is annexed hereto as **Exhibit A**. In the Fareportal Claim, Fareportal asserted a prepetition claim in the “unliquidated amount of no less than \$10,000,000.00” (*see* Addendum to Proof of Claim of Fareportal, Inc. (the “Fareportal Claim Addendum”) at ¶ 1) arising from

the (i) breach of a certain agreement (the “Agreement”) between the Debtor and Fareportal due to, among other things, the misappropriation of Fareportal’s trade secrets by the Debtor and/or its current or former employees, (ii) rejection of the Agreement on the effective date pursuant to Article 8.1 of the Debtor’s *First Amended Chapter 11 Plan of Liquidation*, and (iii) sale of Fareportal’s trade secrets, including without limitation, source code, to Travana, Inc., formerly known as AirTourist, Inc., on or about November 24, 2015.

Id. (footnote omitted). The only documentation attached to the Fareportal Claim’s proof of claim form were a cover letter and the two-page Fareportal Claim Addendum which explained the basis of the claim, the amount of the claim and contained certain reservations of rights. No documentation or other information supporting the basis of the Fareportal Claim was annexed to the Fareportal Claim proof of claim form.

On October 6, 2016, Fareportal filed its *Limited Objection of Fareportal, Inc. to the Debtor’s First Amended Chapter 11 Plan of Liquidation* [ECF No. 232]. This limited objection was consensually resolved by the Debtor’s agreement to include language in the Confirmation Order (see below) clarifying that the Confirmation Order’s release language would not release or

act as an injunction in favor of Travana, Travana's officers and directors or the Debtor's former officers and directors.

On October 13, 2016, the Court held a hearing on confirmation of the *Debtor's Second Amended Chapter 11 Plan of Liquidation* [ECF No. 251-1] (the "Confirmed Plan").

On October 26, 2016, the Court entered the *Findings of Fact, Conclusions of Law and order Confirming the Debtor's Second Amended Chapter 11 Plan of Liquidation* (the "Confirmation Order") [ECF No. 251] which, among other things, approved the Liquidating Trust Agreement attached to the Confirmation Order, created the Liquidating Trust and identified Adam Meislik as the liquidating trustee. The Confirmed Plan became effective on December 2, 2016 (the "Effective Date").

On December 22, 2016, Fareportal initiated an action against Travana, Jason Ware, Ahmet Seyalioglu and Nishith Kumar a/k/a Nishith Varma in the United States District Court for the Southern District of New York (Case No. 16-cv-09882) (the "District Court Action") alleging, among other things, copyright infringement, violation of the Computer Fraud and Abuse Act, violation of the Defend Trade Secrets Act and breach of fiduciary duty and duty of loyalty. Upon information and belief, the District Court Action remains pending.

On January 13, 2017, the Liquidating Trust filed its *First Omnibus Objection of the Liquidating Trust of Airfasttickets, Inc. to Certain Proofs of Claim (Amended and Superseded Claims, Claims to be Reclassified and/or Reduced, and No Liability Claims)* [ECF No. 280] (the "Omnibus Objection") which, among other things, objected to the Fareportal Claim on the basis that it should be expunged in its entirety because the claim was filed without supporting documentation, damages computations for its assertions and there is no basis for a liability Fareportal in the Debtor's books and records.

On February 8, 2017, Fareportal responded to the Omnibus Objection [ECF No. 287] (the "Fareportal Response") disputing the accuracy of the Debtor's books and records and asserting that the Liquidating Trust was on notice of the bases for the Fareportal Claim prior to its filing, due to Fareportal's prior filings in this Chapter 11 Case. Copies of the following documents were annexed to the Fareportal Response: a transcript of the Courts September 14, 2016 hearing regarding Fareportal's 2004 Motion, the filed Fareportal Claim and the complaint Fareportal filed in the District Court Action. Fareportal did not file documentary evidence or testimonial evidence (i.e., an affidavit or declaration) in support of its claims with the Fareportal Claim or the Fareportal Response.

On February 13, 2017, The Liquidating Trust filed its *Omnibus Reply and Status Report Regarding Responses to [the Omnibus Objection]* [ECF No. 290] (the "Omnibus Reply") which, among other things, addressed the objection to the Fareportal Claim and the Fareportal Response.

The Liquidating Trust noted that, due to the objections to the Fareportal Claim raised in the Omnibus Objection, the burden of demonstrating the validity of the Fareportal Claim rest with Fareportal and that Fareportal failed to carry this burden by not providing any evidence in support of the claim. The Liquidating Trust also noted that it had expressly reserved its rights and all further substantive and procedural objections with respect to the Fareportal Claim and argued that the Fareportal Claim should be (i) expunged because it was filed after the General Bar Date without Fareportal having made any request for allowance to file the claim late; (ii) expunged under section 502(e)(1); and (iii) estimated at \$0.00 under section 502(c). The Liquidating Trust stressed that the Fareportal Claim should be resolved so that it did not cause undue delay of the administration of the Debtor's case and distributions to the holders of allowed claims.

On April 11, 2017, the Court entered the Fareportal Order, in which the Court deemed the adjudication of the objection to the Fareportal Claim to be a contested matter and preserved all of the parties rights, including without limitation, (i) the Liquidating Trust's right to amend, modify or supplement the Omnibus Objection as to the Fareportal Claim on any available substantive or procedural ground or to request estimation of the Fareportal Claim under section 502(c) of the Bankruptcy Code; and (ii) Fareportal's right to oppose such objections or arguments and to seek authorization to file a late-filed proof of claim. The Fareportal Order also scheduled the first status conference concerning the Contested Matter for May 24, 2017. At the March 3, 2017 hearing on the Omnibus Objection, the Court explained that the Contested Matter was being placed on pause to permit Fareportal an opportunity to obtain evidence supporting its claims in the other forums.

On April 19, 2017, certain of the Travana's creditors initiated the Travana Bankruptcy by filing an involuntary petition against Travana seeking an order for relief under chapter 7 of the Bankruptcy Code, which Travana subsequently consented to. Andrea A. Wirum was appointed as the Travana Trustee. Upon information and belief, the District Court Action remains pending.

Since the Fareportal Order was entered, nine status conferences have been held, on May 24, 2017; July 25, 2017; September 27, 2017; October 25, 2017; January 10, 2018; March 27, 2018; May 1, 2018; June 12, 2018 and August 22, 2018. At several of these status conferences, Fareportal provided updates on its efforts to obtain discovery in the Travana Bankruptcy. Notably, (i) at the October 25, 2017 status conference, six months after the Fareportal was entered, Fareportal stated that it was prepared to commence discovery against Travana after resolving a cost-sharing dispute with the Travana Trustee; (ii) at the March 27, 2018 status conference, Fareportal stated (a) that discovery against Travana had completed, (b) that Fareportal and the Travana Trustee were in settlement discussions that should be completed in the next few weeks, and (c) that no agreement or evidence sharing with the Liquidating Trust should proceed until settlement with the Travana Trustee was finalized; and (iii) as of the last status conference, on August 22, 2018, the negotiations between Fareportal and the Travana Trustee were still ongoing.

Arent Fox

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Current Status

Since the last status conference, the Liquidating Trust learned from the Travana Trustee that settlement discussions between Fareportal and the Travana Trustee had collapsed and that it appeared unlikely any deal between those two parties would emerge. Despite this collapse, and the approximately eight months since discovery against Travana completed, Fareportal has yet to amend the Fareportal Claim with, or otherwise provide, any evidence supporting its claims. Since the Liquidating Trust learned of the termination of the Travana settlement discussions, Fareportal and the Liquidating Trust have participated in certain limited settlement discussions. However, given the absence of any evidence supporting Fareportal's claims, thus far, the Liquidation Trust is not in a position to settle the Contested Matter. The Liquidating Trustee is open to assisting Fareportal in its acquisition of, and sharing of, relevant evidence to the extent the Liquidating Trust is able to assist and the Court deems such assistance appropriate. The burden of establishing the validity of Fareportal's claims, however, lie with Fareportal and the time and efforts expended in acquiring such evidence must be borne by Fareportal.

Respectfully submitted,



Aram Ordubegian

cc: Malani Cademartori, Esq.

Exhibit A

Fill in this information to identify the case:

Debtor 1 Airfasttickets, Inc.

Debtor 2 (Spouse, if filing) _____

United States Bankruptcy Court for the: Southern District of New York

Case number 15-11951 (SHL)

RECEIVED
OCT 03 2016
BMC GROUP

Official Form 410
Proof of Claim

12/15

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor? Fareportal, Inc.
Name of the current creditor (the person or entity to be paid for this claim) _____
Other names the creditor used with the debtor _____

2. Has this claim been acquired from someone else?
 No
 Yes. From whom? _____

3. Where should notices and payments to the creditor be sent?
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
<u>Sheppard Mullin Richter & Hampton, LLP</u>	<u>Fareportal, Inc. (Attn: Werner G. Kunz)</u>
Name	Name
<u>30 Rockefeller Plaza (Attn: M. Cademartori)</u>	<u>135 West 50 Street, Suite 500</u>
Number Street	Number Street
<u>New York NY 10112</u>	<u>New York NY 10020</u>
City State ZIP Code	City State ZIP Code
Contact phone <u>212-653-8700</u>	Contact phone <u>646-738-7813</u>
Contact email <u>mcademartori@sheppardmullin.com</u>	Contact email _____

Uniform claim identifier for electronic payments in chapter 13 (if you use one):

4. Does this claim amend one already filed?
 No
 Yes. Claim number on court claims registry (if known) _____ Filed on _____
MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?
 No
 Yes. Who made the earlier filing? _____

AirFastTickets, Inc. POC
00086

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor? No
 Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____

7. How much is the claim? \$ not less than \$10,000,000. Does this amount include interest or other charges?
 No
 Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
Limit disclosing information that is entitled to privacy, such as health care information.
See attached addendum.

9. Is all or part of the claim secured? No
 Yes. The claim is secured by a lien on property.
Nature of property:
 Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
 Motor vehicle
 Other. Describe: _____
Basis for perfection: _____
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)
Value of property: \$ _____
Amount of the claim that is secured: \$ _____
Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)
Amount necessary to cure any default as of the date of the petition: \$ _____
Annual Interest Rate (when case was filed) _____ %
 Fixed
 Variable

10. Is this claim based on a lease? No
 Yes. Amount necessary to cure any default as of the date of the petition. \$ _____

11. Is this claim subject to a right of setoff? No
 Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

No

Yes. Check all that apply:

	Amount entitled to priority
<input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).	\$ _____
<input type="checkbox"/> Up to \$2,775* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).	\$ _____
<input type="checkbox"/> Wages, salaries, or commissions (up to \$12,475*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).	\$ _____
<input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).	\$ _____
<input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).	\$ _____
<input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.	\$ _____

* Amounts are subject to adjustment on 4/01/16 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

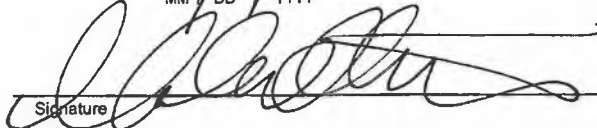
- I am the creditor.
- I am the creditor's attorney or authorized agent.
- I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
- I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 09/30/2016
MM / DD / YYYY


Signature

Print the name of the person who is completing and signing this claim:

Name Malani J. Cademartori
First name Middle name Last name

Title Partner

Company Sheppard Mullin Richter & Hampton, LLP
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address 30 Rockefeller Plaza
Number Street

New York NY 10112
City State ZIP Code

Contact phone 212-653-8700 Email mcademartori@sheppardmullin.com

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

AIRFASTTICKETS, INC.

Debtor.

Chapter 11

Case No. 15-11951 (SHL)

ADDENDUM TO PROOF OF CLAIM OF FAREPORTAL, INC.

A. CREDITOR INFORMATION

All communications regarding this Proof of Claim filed by Fareportal, Inc. (“**Fareportal**”) should be addressed to Fareportal (Attn: Werner G. Kunz), 135 West 50 Street, Suite 500, New York, New York 10020, Telephone (646) 738-7813, with a copy to Malani J. Cademartori, Esq., Sheppard Mullin Richter & Hampton LLP, 30 Rockefeller Plaza, New York, New York 10112, Telephone (212) 653-8700.

B. CLAIM INFORMATION

1. Basis for Claim. Fareportal holds potential pre-petition claims (the “**Claim**”) in an unliquidated amount of no less than \$10,000,000.00, in the aggregate, against debtor Airfasttickets, Inc. (the “**Debtor**”) arising from the (i) breach of a certain agreement (the “**Agreement**”) between the Debtor and Fareportal due to, among other things, the misappropriation of Fareportal’s trade secrets by the Debtor and/or its current or former employees,¹ (ii) rejection of the Agreement on the effective date pursuant to Article 8.1 of the Debtor’s *First Amended Chapter 11 Plan of Liquidation*, and (iii) sale of Fareportal’s trade secrets, including without limitation, source code, to Travana, Inc., formerly known as AirTourist, Inc., on or about November 24, 2015. The amount and liability of the Debtor for the

¹ Due to the confidentiality of the existence and subject matter of the Agreement, the Bankruptcy Court approved the sealing of certain pleadings filed by Fareportal that describe the Agreement. See Dkt. Nos. 205, 227 (the “**Sealing Orders**”). The Debtor, the Court, the United States Trustee and certain other parties have been provided with the Agreement pursuant to the Sealing Orders.

amounts asserted herein shall be proven at a later date and through an appropriate proceeding on the issues, following further discovery.

2. Amount and Classification of Claim. Fareportal holds an unsecured claim in an unliquidated amount of no less than \$10,000,000, in the aggregate.

3. Setoff. The Claim is not subject to any known right of setoff held by the Debtor.

4. Reservation of Rights. Fareportal reserves its rights to amend or further supplement this Proof of Claim in all respects, including, but not limited to, liquidating any unliquidated amounts, asserting a claim or claims for additional amounts due and/or claims based on alternative theories or liabilities, and asserting any claims for damages arising from events or conduct by the Debtor. Moreover, Fareportal hereby reserves its rights to assert all or part of the claim as an administrative or other priority claim, and to file additional claim(s) or application(s) for payment of such administrative or priority claims.

Filing of this Proof of Claim is not: (a) a waiver or release of Fareportal's rights against any person, entity or property, including without limitation, any officers, directors or other principals of the Debtor; (b) a consent by Fareportal to the jurisdiction of this Court with respect to proceedings, if any, commenced in any case against or otherwise involving Fareportal; (c) a waiver or release of Fareportal's right to trial by jury in any proceeding as to any and all matters so triable herein, notwithstanding the designation or not of such matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2); (d) a waiver or release of Fareportal's right to have any and all final orders in any and all non-core matters or proceedings entered only after *de novo* review by a United States District Court Judge; or (e) an election of remedy.

SheppardMullin

Sheppard Mullin Richter & Hampton LLP
30 Rockefeller Plaza
New York, NY 10112-0015
212.653.8700 main
212.653.8701 main fax
www.sheppardmullin.com

212.634.3055 direct
MDriscoll@sheppardmullin.com

September 30, 2016

File Number: 47CT-245952

VIA FEDEX

BMC Group, Inc.
Attn: Airfasttickets Claims Processing
3732 West 120th Street
Hawthorne, CA 90250

Original

Re: *In re Airfasttickets, Inc.*, Case No. 15-11951
Proof of Claim of Fareportal, Inc.

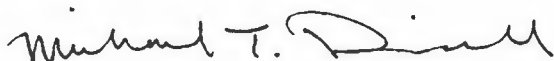
Dear Sir/Madam:

Enclosed please find an original and one additional copy of the Proof of Claim of Fareportal, Inc. in the above referenced bankruptcy case.

Please date-stamp the enclosed copies (which are marked as such) upon receipt, and return the date-stamped copy in the enclosed stamped, self-addressed envelope.

Please do not hesitate to contact me with any questions regarding the enclosed.

Sincerely,



Michael T. Driscoll
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

Enclosures