

Exhibit B

DEFINITIONS:

- A. **Stay Relief Motions** means those motions identified on the attached Exhibit A. **Movants** means the persons seeking stay relief pursuant to those motions.
- B. **Complaints** means the state court complaints referenced or attached to the Stay Relief Motions.
- C. **Accident Dates** means the dates set forth in the Complaints as referenced on Exhibit A.
- D. **Debtors** means all Debtor Defendants referenced in the Complaints or Stay Relief Motions, as set forth on Exhibit A.
- E. **Debtors' Objection** means the *Debtors' Objection to Motion of Rosalinda Simon and Diego Acosta for Relief from the Automatic Stay* (D.I. 257), filed on February 27, 2012 and any similar objection filed by the Debtors to any pending Stay Relief Motion.
- F. **Deductible** means the defined term "Deductible" as set forth in paragraph 8 of the Debtors' Objection.
- G. **Letters of Credit** means the defined term "Letters of Credit" set forth in footnote 3 to the Debtors' Objection.
- H. **Collateral** means the Collateral held by Chartis Claims, Inc. as set forth on Rider B.3 to Schedule B for In re: CUSA, LLC, in the identified amount of \$2,200,000.00.
- I. **Document** means all handwritten, printed, graphic, typed, electronically recorded, sound recorded, or computer readable materials, or other recorded or graphic matter of every type and description, however and by whomever prepared, produced, reproduced, disseminated, assimilated, or made in any form which is or was in your actual or constructive possession, custody, or control, whether the original, draft, carbon, photographic, or other copy, reproduction, or facsimile thereof, *including, but not limited to*, any and all records, files, writings, letters, minutes, correspondence, advertisements, publications, mailgrams, telegrams, bulletins, instructions, resolutions, charts, literature, work assignments, reports, brochures, memoranda, notations of telephone or personal conversations or conferences, telephone messages, transcripts, price lists, contracts, agreements, checks, canceled checks, interoffice communications, calendars, daytimers, diaries, logs, notes, notebooks, ledgers, cards, drafts, microfilm, microfiche, circulars, pamphlets, studies, notices, summaries, reports, books, invoices, graphs, diagrams, photographs, data sheets, data compilations, computer data sheets, computer data compilations, worksheets, records, statistics, speeches, and any other writings, tapes, sound records, or data compilations from which information can be obtained or can be translated through detection devices into reasonably useable form, any other document, writing, recordings, tangible thing or photograph. The term "document" or "documents" shall also mean each copy which is not identical to the original, or to any other identified copy, and all drafts and

notes (whether typed, handwritten, or otherwise) made or prepared in connection with such documents whether used or not.