

EXHIBIT B

BARACK FERRAZZANO KIRSCHBAUM & NAGELBERG LLP

200 WEST MADISON STREET, SUITE 3900
CHICAGO, ILLINOIS 60606

Wendi E. Sloane
(312) 984-3166
Voice Mail Ext. 4166
wendi.sloane@bfkn.com

Telephone (312) 984-3100
Facsimile (312) 984-3150

February 22, 2008

VIA MESSENGER

The Honorable Susan Pierson Sonderby
United States Bankruptcy Judge
Everett McKinley Dirksen United States Courthouse
219 S. Dearborn St., Chambers 638
Chicago, IL 60604

VIA EMAIL AND OVERNIGHT MAIL

Brion Doyle, Esq.
Varnum, Riddering, Schmidt & Howlett, LLP
Bridgewater Place
333 Bridge Street, N.W.
P.O. Box 352
Grand Rapids, MI 49501-0352

Re: *In re Kmart Corporation*, 02-B-02474:
Objection to the Claims of Global Property Services, Inc. ("Global")

Dear Judge Sonderby and Brion:

Pursuant to the Agreed Order re Motion of Kmart Corporation for Protective Order, Kmart submits the following information to Global and to the Court for *in camera* review:

- Exhibit A is a list of the names of the folders on the P: and W: drives. Also identified on Exhibit A are the names of the folders that Kmart identified to be searched, and the size of each folder.
- Exhibit B is a list of the search terms that Kmart developed for the electronic search of the P: and W: drives
- Exhibit C includes the "screen shots" of the results of certain computerized document searches.
- Exhibit D are attorneys' notes reflecting the results of certain searches conducted by Kmart's contract attorneys. In the Exhibit D produced to Global, Kmart has redacted a portion of the attorneys' notes in the document bates stamped numbered Kmart PW 0024 on the basis that this information is

BARACK FERRAZZANO KIRSCHBAUM & NAGELBERG LLP

The Honorable Susan Pierson Sonderby
February 22, 2008
Page 2

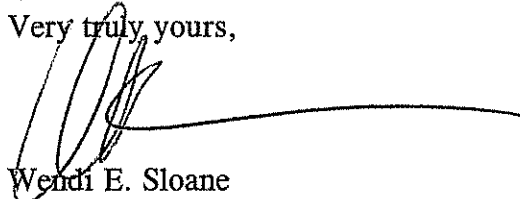
protected by the attorney work product doctrine. Kmart submits an un-redacted version to the Court.

- Exhibit E are oversized Excel spreadsheets that identify the status of the search with respect to each folder.

The documents produced herein are designated as confidential pursuant to the Agreed Protective Order proposed by Kmart and currently being considered by Global, which extends to Kmart the same protections afforded to Global, Global Property Management, Inc. and Brock Sweeping, Inc. pursuant to the Stipulated Protective Order entered on April 11, 2007. Based on George Mesires' teleconference with Brion Doyle this afternoon, we understand that Global will likely consent to the entry of the Agreed Protective Order but counsel has not had the opportunity to review and sign the agreement. Accordingly, we are producing these documents under the assumption that Global will agree to the entry of the protective order. If not, then Kmart will request that Global promptly return the documents produced herein.

Also enclosed is a copy of the Agreed Order re Kmart Corporation's Motion for Protective Order for entry.

Very truly yours,

A handwritten signature in black ink, appearing to be "Wendi E. Sloane", with a long horizontal line extending to the right.

Wendi E. Sloane

Enclosures

cc: George R. Mesires, Esq.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:

KMART CORPORATION,

Debtor.

Case No. 02 B 02474

Honorable Susan Pierson Sonderby

Hearing Date: February 13, 2008

Hearing Time: 1:00 p.m.

AGREED ORDER RE
MOTION OF KMART CORPORATION FOR PROTECTIVE ORDER

This matter having come before the Court on Motion of Kmart Corporation ("Kmart")
For Protective Order, proper notice having been given, and the Court having heard argument
on February 13, 2008, and the Court being fully advised in the premises, IT IS HEREBY
ORDERED THAT:

(i) On or before February 22, 2008, Kmart shall submit to Global Property
Services ("Global"), subject to the terms of a stipulated protective order, and to the Court for
in camera review, except as otherwise noted below, the following information:

- The names of the folders on the P: and W: drives;
- The names of the folders that Kmart identified to be subject to the search of the P: and W: drives, and the status of the search with respect to each folder. Kmart shall identify the size of each folder.
- The search terms Kmart developed for the electronic search of the P: and W: drives;
- "Screen shots" of the results of certain computerized document searches;
- Attorneys' notes reflecting the results of certain searches conducted by Kmart's contract attorneys to the extent that Kmart is not asserting that such notes are privileged work product. To the extent that Kmart asserts that the attorneys' notes are privileged work product, Kmart shall only be required to submit such work product to the Court for *in camera* review only.

(ii) Nothing in this Agreed Order shall be deemed to be a waiver of Global's objections to Kmart's Motion For Protective Order

(iii) This matter is set for a telephonic status call at 2:00 p.m. on February 26, 2008.

Dated:

Enter:

United States Bankruptcy Judge

W: Folder Name	To Be Searched	Size
Accounting	Yes	23.0 GB
Advertising	No	45.3 GB
ALT	Contents not determined - partially searched	45.5 MB
AuditServices	Yes	36.2 GB
Batch	No but partially searched	21.5 KB
BlueLightImages	No	110 MB
BuildingServices	Yes	2.95 GB
CD	Contents not determined - partially searched	30.8 KB
Construction	No	74.7 GB
CorpCommunications	No	20.0 GB
CorporatePurchasing	No	24.8 GB
CrossFunctionalTeams	Contents not determined - partially searched	634 KB
Customer Service	No	1.03 GB
DC Talent Planning	Contents not determined - partially searched	0 MB
DCBackupStats	Yes	20.0 KB
eBusiness	No	24.7 GB
ERoom	Contents not determined - partially searched	235 MB
Facility Management Division	Yes	95.8 GB
FieldOrganizationalDevelopment	No	816 MB
Finance	Yes	520 GB
FoodSafety	No	11.8 GB
Greenwich	Yes	0 MB
HumanResources	No	543 GB
ICT	Contents not determined - partially searched	2.99 GB
Innovations	Yes	2.58 GB
International	No	45.7 GB
Internet	No	352 MB
IT	No	100 MB
KIS	Yes	970 GB
KRecap	Contents not determined - partially searched	0 MB
Legal	Yes	23.4 GB
Logistics	Yes	85.2 GB
MBO	Contents not determined - partially searched	6.44 MB
Merchandising	No	1.20 TB
OperationalEfficiency	Yes	107 MB
PalatineW	Contents not determined	16.9 GB
Pharmacy	No	290 GB
Pharmacy Talent Planning	No	147 MB
Price Services	Yes	4.65 GB
PriceOptimization	Yes	23 GB
Pricing and Product Development	No	41.8 GB
PROCESS RE-ENGINEERING	Yes	170 GB
Project Breakout	Contents not determined	2.18 MB
Randy Allen	Contents not determined - partially searched	1.11 GB
Real Estate	Yes	5.50 GB
RealEstateMarketing	Contents not determined	54.0 GB
RestaurantImagingExpressOps	No	1.51 GB
Risk Management	No	4.41 GB
StoreClosing	Contents not determined	24.9 GB
StoreOperations	Yes	114 GB
SuperK	No	37.3 GB
SupplyChain	No	4.58 GB
SVP Docs	Contents not determined - partially searched	43.8 MB
Tax	No	30.5 MB
TivoliManager	Yes	30.6 MB
TrainingRooms	No	13.6 MB
Transition Management	No	5.63 GB
Transportation	No	5.90 GB
transprtation	No	138 MB
VendorAdministration	Yes	22.6 GB
As of approximately February 2008		

CONFIDENTIAL

KMART PW 0002

First Tier Search Terms

Global Property
Exterior Maintenance
Idzior
Brock

Second Tier Search Terms

GPS
Komineck
Slimp
Plow(ing)
Lawn
Landscape (Landscaping)

Third Tier Search Terms

National Contract
Sweep(ing)
Salt
BW Maintenance
Brock Sweeping
C&J Sweeping
Clarkston Scott's Lawn Care
Commercial Sweeping
Custom Lawn
D&S Lawn Care
Field of Dreams
Four Seasons
Gordon's Landscaping
Lawn Perks
Morin Lawn
Power Sweeping Services
TK Cleaning

CONFIDENTIAL

KMART PW 0003

File Edit View Favorites Tools Help

Back Search Folders

Address Y:\Global\Search results\P drive - Accounting - Global Property search term

File and Folder Tasks

- Move the selected items
- Copy the selected items
- Publish the selected items to the Web
- Email the selected items
- Delete the selected items

Other Places

- Search results
- My Documents
- My Computer
- My Network Places

Details

Name	Size	Type	Date Modified
2003 Hold - Review	919 KB	Microsoft Excel Worksh...	3/10/2004 1:10 PM
2004 MISC DISB SUPER K REGION	30,269 KB	Microsoft Excel Worksh...	2/15/2005 12:58 PM
A13540 2007	3,377 KB	Microsoft Excel Worksh...	8/13/2007 2:17 PM
A13540 Period 3 2007	3,367 KB	Microsoft Excel Worksh...	5/18/2007 11:25 AM
Current Open Claims Summary	369 KB		
pd 04 2007 Acct 13540	3,371 KB		
pend 0506	2,236 KB		
pending P1 05	2,683 KB		
pending P2 05	4,060 KB		
pending P3	1,372 KB		
pending P3 05	1,240 KB		
pending P3 Review	2,199 KB		
pending P4	4,119 KB		
pending P5	2,683 KB		
pending P5 of 2007	1,785 KB		
pending P6 04	2,502 KB		
pending P6 05	2,012 KB		
pending P6 of 2006	1,773 KB		
pending P7 05	2,558 KB		
pending P12	1,283 KB		
pending P1205	815 KB		
Period 1 04	1,340 KB		
Period 2 04	1,331 KB		
Period 3 2004 Ending Pending with MAs and Returns	1,912 KB		
Period 3 2004 Ending Pending with MAs and Returns 05	5,284 KB		
Period 6 2003 Ending Pending with MAs & Returns	2,762 KB		
Period 9 2003 Ending Pending with MAs and Returns	2,970 KB		
Post Pending Summary Period 11 and 12 (Ending) 2003	2,540 KB		
Potential Resolution 5-04	374 KB		
tblClaimInfo	4,386 KB		

Period 6 2003 Ending Pending with MAs & Returns

General Security Summary

30 Files, 0 Folders

Type: All of type Microsoft Excel Worksheet

Location: All in Y:\Global\Search results\P drive - Accounting

Size: 95.5 MB (100,233,216 bytes)

Size on disk: 95.6 MB (100,278,272 bytes)

Attributes: ☐ Read-only ☐ Hidden ☒ Archive

OK Cancel Apply

Folder: P:\Accounting

Search Term: Global Property

my start

Inbox - ... P drive - ... Desktop

Global Global Pr... Global Pr... Screench... Screench... Master V... My Docu...

10:37 AM Wednesday 3/23/2007

CONFIDENTIAL

KMART PW 0004

Folder: P:\Accounting Search Term: Exterior Maintenance

Address: Y:\Global\Search results\P drive - Accounting - Exterior Maintenance search term

File Edit View Favorites Tools Help

Back Search Folders

File and Folder Tasks

- Move the selected items
- Copy the selected items
- Publish the selected items to the Web
- E-mail the selected items
- Delete the selected items

Other Places

- Search results
- My Documents
- My Computer
- My Network Places

Details

Name Size Type Date Modified

2nd Half 03 OH allocation calc	262 KB	Microsoft Excel Wor...	8/7/2004 8:42 AM
2000 KMI State Filing Statements			
2001 KMI State Filing Statements			
2003 Hold - Review			
2003 Indiana Form 1065			
2004 MISC DISB WEST REGION			
2005 Kmart Consolidated Balance Sheet			
2005 Kmart Consolidated Income Statement			
2005 Kmart of's			
2005 Kmart of's (Corrected data 8_29)			
2006 Kmart of's			
21155 PD 1			
21155 PD 5			
A13540 2007			
A13540 Period 3 2007			
Account Conversion Table			
Account Listing			
CHART OF ACCOUNTS			
CHART OF ACCOUNTS AS OF 11 7 00 OLD AND NEW			
Corp			
Corp Alloc			
Corp Alloc 061200			
FY 2004 (FYE1-05) Overhead Allocation			
Guam Tax 1_2006			
HLVENDAT			
ICTRETRO - AR - STORE AND PHARMACY SALES			
IL Statements Pd 9 2003 Focus			
IN expense comparison			
IN GOB Statements			
IND			
Indiana accounts 1999			
Indiana OH Allocation 1999			
Indiana Statements			
Indiana Statements 1-2004			

Account Conversion Table, ... Properties

General Security Summary

110 Files, 0 Folders

Multiple Types

Location: All in Y:\Global\Search results\P drive - Accounting

Size: 298 MB (313,014,721 bytes)

Size on disk: 298 MB (313,217,024 bytes)

Attributes:

- ☐ Read-only
- ☐ Hidden
- ☒ Archive

OK Cancel Apply

562 KB Microsoft Excel Wor... 1/2/2003 8:44 AM

1,116 KB Microsoft Excel Wor... 3/17/2000 9:08 AM

1,073 KB Microsoft Excel Wor... 8/18/2004 1:24 PM

Search... Personal... Master V... Obama S...

Revised... Document... Document... Document...

Desktop P drive - ... Global

Inbox - ... My Docu...

Start

CONFIDENTIAL

KMART PW 0005

Microsoft Outlook - P drive - Finance - Accounts Payable - Global Property search term

File Edit View Favorites Tools Help

Back Search Folders

Address Y:\Global\Search results\p drive - Finance - Accounts Payable - Global Property search term

File and Folder Tasks

- Move the selected items
- Copy the selected items
- Publish the selected items to the Web
- E-mail the selected items
- Delete the selected items

Other Places

- Search results
- My Documents
- My Computer
- My Network Places

Details

Name	Size	Type	Date Modified
January 1st 2004 Check Summary ONLY	186 KB	Microsoft Excel Wor...	12/31/2003 7:48 AM
January 2nd Check Summary ONLY	200 KB	Microsoft Excel Wor...	1/2/2003 10:15 AM
January 8th 2004 Check Summary ONLY			
January 9th Check Summary ONLY			
January 16th Check Summary ONLY			
January 23rd Check Summary ONLY			
January 30th Check Summary ONLY			
Journal PRD 803 week 33			
Journal PRD 1003 week 40			
July 3rd 2003 Check Summary ONLY			
July 4th Check Summary ONLY			
July 11th Check Summary ONLY			
July 17th 2003 Check Summary ONLY			
July 18th Check Summary ONLY			
July 24th 2003 Check Summary ONLY			
July 25th Check Summary ONLY			
June 5th 2003 Check Summary ONLY			
June 6th Check Summary ONLY			
June 13th Check Summary ONLY			
June 19th 2003 Check Summary ONLY			
June 20th Check Summary ONLY			
June 26th 2003 Check Summary ONLY			
June 27th Check Summary ONLY			
KHC as of 9-30-04			
KHC as of 9-30-04			
Kmart - 18th Omnibus Exhibits			
Kmart - 19th Omnibus - Amended Exhibits			
Kmart - 19th Omnibus - Ex A-J			
Kmart Acknowledgement Motion Exhibits - 030902			
Kmart Equiserve accounts as of 040107			
Kmart Equiserve accounts as of 040107			
Kmart Executive Summary_040914APTeam			
Kmart Executive Summary_040922			

Global Store Detail - Pd 2-03, ... Properties

General Security Summary

1,543 Files, 0 Folders

Type: Multiple Types

Location: All in Y:\Global\Search results\p drive - Finance - A

Size: 5.19 GB (5,577,603,603 bytes)

Size on disk: 5.19 GB (5,580,353,536 bytes)

Attributes: ☒ Read-only ☐ Hidden ☒ Archive

Folder: P:\Finance\Accounts Payable

Search Term: Global Property

403 KB Adobe Acrobat 7.0 ... 9/22/2004 4:35 PM

start P drive - Finance - Ac... P drive - Finance - P drive - Screenshot of P drive... Inbox - Microsoft Out... Wk Spreadsheet 2 screen...

KMART PW 0006

CONFIDENTIAL

Edit View Favorites Tools Help



Y:\Legal, Ext. Maint. Noonan

File and Folder Tasks

- Move the selected items
- Copy the selected items
- Publish the selected items to the Web
- E-mail the selected items
- Delete the selected items

Other Places

- C:\homediron\usinfo\syntappl\(*)
- My Documents
- My Computer
- My Network Places

Details

- Account 5058 vendors 3-13-03
- April 25th Check Summary ONLY
- BILLVP2
- Cash Disc reporting for fiscal 2005 9-26-06
- Chart of Accounts
- Check registers from SAR 1-09 TO 1-19
- Copy (2) of account 5058 vendors 3-13-03
- Copy (2) of April 25th Check Summary ONLY
- Copy (2) of BILLVP2
- Copy (2) of Cash Disc reporting for fiscal 2005 9-26-06
- Copy (2) of Check registers from SAR 1-09 TO 1-19
- Copy (2) of Copy of VDB Active Vendors FY01 - FY03 - Final for active merch vendors
- Copy (2) of DUNS INFO CONTINUED WITH VENDOR INFO KATHY BUNTON
- Copy (2) of Expense Terms as of Nov 30 2001
- Copy (2) of Expense Vendor Listing 3-21-03
- Copy (2) of Hardlines and Expense 1999 through 2001
- Copy (2) of Hardlines and Softlines Checks from 12-22-01 through 1-22-02
- Copy (2) of hardlines vdb as of 2-2-07
- Copy (2) of HCLKS1
- Copy (2) of Merchandise and Expense Period 1 - 5/2002
- Copy (2) of Purchase Records Period 1-7 2003 Summary By Vendor
- Copy (2) of Purchase Records Period 1-8 2003 Summary By Vendor
- Copy (2) of raps er 3-4-05
- Copy (2) of RAPS ER 5-23-05
- Copy (2) of VDB database as of 9-14-05
- Copy (2) of Weekly Check Summary 4-23 thru 4-29-02
- Copy (2) of Weekly Check Summary 5-07 thru 5-13-02
- Copy (2) of Weekly Check Summary 5-14 thru 5-20-02
- Copy (2) of Weekly Check Summary 5-21 thru 5-27-02
- Copy (2) of Weekly Check Summary 5-28 thru 6-03-02
- Copy (2) of Weekly Check Summary 6-11 thru 6-17-02
- Copy (2) of Weekly Check Summary 7-02 thru 7-08-02
- Copy (2) of Weekly Check Summary 7-09 thru 7-15-02
- Copy (2) of Weekly Check Summary 7-23 thru 7-29-02

- Copy (2) of Weekly Check Summary 62502 through 70102
- Copy (2) of Weekly Check Summary Ck Dtes 4-02-02 thru 4-0
- Copy (2) of Weekly Check Summary Ck Dtes 4-09-02 thru 4-1
- Copy (2) of Weekly Ck Summary 7-30 thru 8-05-02
- Copy (2) of Weekly Ck Summary 8-06 thru 8-12-02
- Copy (2) of Weekly Ck Summary 8-13 thru 8-19-02
- Copy (2) of Weekly Ck Summary 8-20 thru 8-26-02
- Copy (2) of Weekly Ck Summary 8-27 thru 9-02-02
- Copy (2) of Weekly Ck Summary 9-03 thru 9-09-02

Copy (2) of Check registers from SAR 1-09 TO 1-19

General Security

251 Files, 0 Folders

Type: Multiple Types

Location: All in Y:\Legal, Ext. Maint. Noonan

Size: 1.79 GB (1,924,263,762 bytes)

Size on disk: 1.79 GB (1,924,706,304 bytes)

Attributes: ☐ Read-only ☐ Hidden ☒ Archive

OK Cancel Apply

Start

ESPN - Battery 50 thru

Inbox - Microsoft Office

Legal, Ext. Maint. Noonan

Folder: P:\Legal

Search Term: Exterior Maintenance

KMART PW 0007

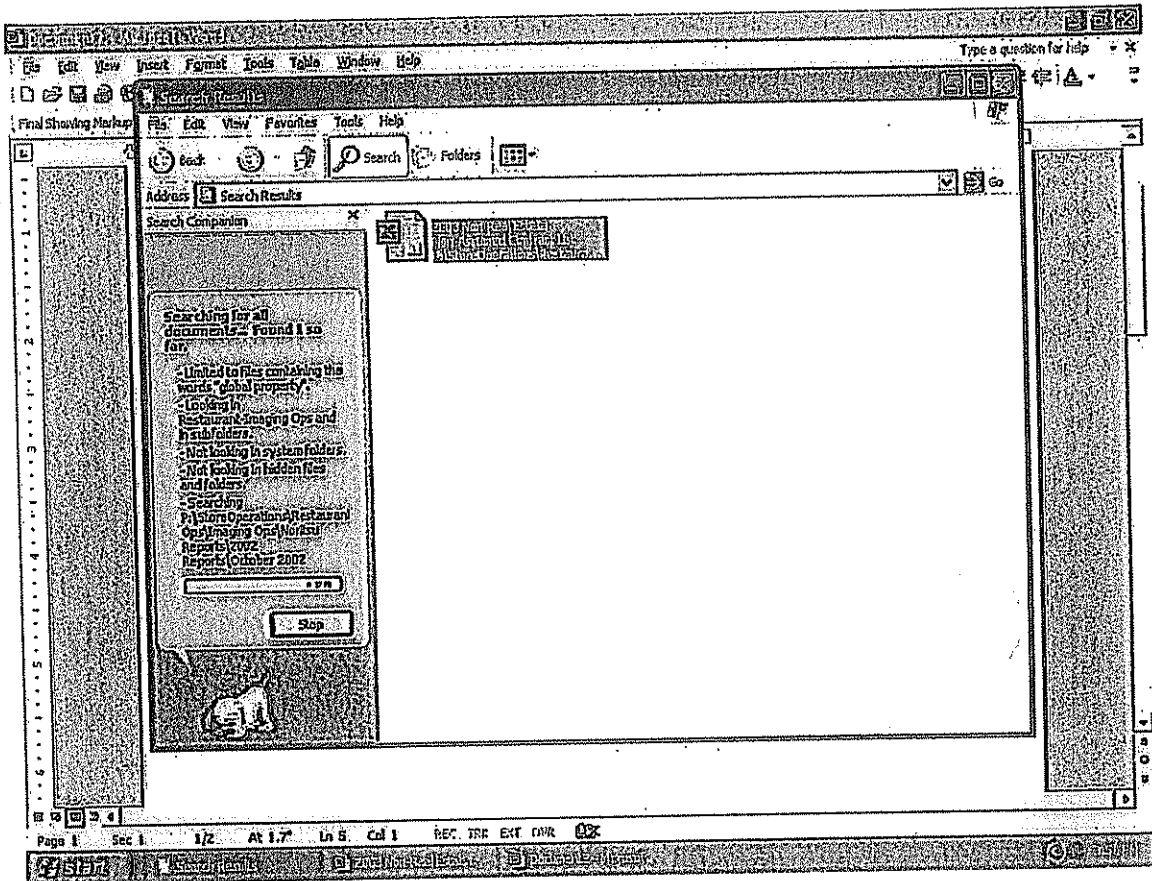
CONFIDENTIAL

2003-03-19 4:51 PM

Privileged and Confidential -- Attorney Work Product -- Prepared in anticipation of litigation

Screen shot depicting search:

Term "global property" in folder: P:\StoreOperations\Restaurant Ops



Folder: P:/Store Operations/Restaurant—Imaging
Ops
Search Term: Global Property