

--- On Fri, 9/25/09, Timothy D. Scrantom (Juridica Management) <[scrantom@juridica.co.uk](mailto:scrantom@juridica.co.uk)> wrote:

From: Timothy D. Scrantom (Juridica Management) <[scrantom@juridica.co.uk](mailto:scrantom@juridica.co.uk)>  
Subject: RE: S&T Oil Equipment and Machinery  
To: [valy\\_two@yahoo.com](mailto:valy_two@yahoo.com), "Mark H. Broadwater (Juridica Management)" <[broadwater@juridica.co.uk](mailto:broadwater@juridica.co.uk)>  
Cc: "Richard W. Fields (Juridica Management)" <[fields@juridica.co.uk](mailto:fields@juridica.co.uk)>, [danbrennan@matrixlaw.co.uk](mailto:danbrennan@matrixlaw.co.uk)  
Date: Friday, September 25, 2009, 1:04 PM

Dear Valerian:

I assume you have received a letter from King & Spalding concerning the sharing of information relating to the case. In that letter, they do not ask you to waive the attorney-client privilege. Rather, they offer the opinion that the sharing of information will fall within an exception to the rules relating to waivers of privilege—the so-called “common interest exception”. As we understand it, this exception permits a person (such as you and/or S&T) to share privileged information with another person (such as Juridica) if the two have a “common interest” in the claim or defense that is the subject of the privileged information. This exception is recited in both the Investment Agreement and the Non-Disclosure Agreements that you signed, under advice from King & Spalding.

Thus, although King & Spalding originally took the position that you must waive the privilege in communications with us, they have now changed their position. On this basis, we assume the meeting in Chicago scheduled for Monday will go forward as planned.

Please confirm your availability for this meeting by return message, as the King & Spalding lawyers and we have already made our travel arrangements.

Kind regards

Tim

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