

MCGARRY DECLARATION EXHIBIT F



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July 5, 2012

Via Electronic Mail

Brooks R. Brown
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Re: *In Re: Bank of America Home Affordable Modification
Program (HAMP) Contract Litigation
Case No. 1:10-md-2193-RWZ (D. Mass.)*

Dear Brooks:

Thank you for your letter of July 2, 2012 related to the parties' meet and confer process to seek agreement on a data and document sample. We believe the Plaintiffs' revised request for a sample of data and documents, contained in our letter of June 14, 2012, to be fully understandable in light of our many discussions and the deposition record, as well as the common meaning of the words we chose. We also continue to believe that your consistent position that we must more specifically identify the names of fields and other data and documents in BOA records that are inaccessible to us is unreasonable.

As these issues have been pending for some time, and in light of the various exchanges on this issue, as well as the guidance of the Court that Plaintiffs are entitled to this information, we believe that we have reached an impasse on the data and document sample requested in Plaintiffs' request for production of documents and will proceed accordingly.

Very truly yours,


Gary Klein

July 5, 2012

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cc: Dahlia Fetouh
James McGarry
Ari Brown
Tyler Weaver
Shennan Kavanagh
John McGowan
Kevin Costello