

Exhibit K

From: Ari Brown <ari@hbsslaw.com>
Sent: Wednesday, August 01, 2012 8:20 PM
To: Goldstein, Seth; Hoeplinger, Stephen M
Cc: Gary Klein; Shennan Kavanagh; Kevin Costello; Steve Berman; Tyler Weaver
Subject: RE: In re Bank of America Home Affordable Modification Program (HAMP) Contract Litig., MDL No. 2193

Seth,

Unfortunately these amended designations change little. We have reviewed the amended designations in your letter and continue to dispute that the testimony of Christopher Orris, Tawnya Schoolitz, Lourdes Duarte, and Jinja Martin, as stated in your letter, should be treated as confidential. These designations are simply not the type of testimony that is entitled to confidential protection under Rule 26

We now consider the LR 37.1 procedure to be closed and our dispute remains unresolved. We will continue to treat these portions of the transcripts as confidential for the next 14 days pending any motion you may bring as stated in Paragraph 15 of the protective order. While we do not believe anything has been properly designated, to reduce the burden on the court, we will remove our challenge to the sections you designate in the Duarte transcript and to page 198, line 21 through page 202 in the Martin transcript. We will reserve the right to renew our challenge to the confidential designations of these portions in the future.

Sincerely,

Ari Brown | **Hagens Berman Sobol Shapiro LLP** | Direct: (206) 268-9311