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By E-mail and U.S. Mail

Special Master Ralph I. Lancaster
Pierce Atwood LLP
Merrill's Wharf
254 Commercial Street
Portland, ME 04101
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Re. *Florida v. Georgia*, No. 142, Original

Dear Special Master Lancaster:

Georgia writes to provide additional information relevant to the parties' joint request for a 45-day extension. Shortly after our joint submission, Florida produced almost 200,000 pages of additional documents. This production was a surprise, because Georgia specifically asked Florida for information concerning upcoming productions, for three reasons: (1) so that we could take whatever steps necessary to handle additional back-end productions; (2) so that we could ensure that document production was complete for upcoming depositions; and (3) so that we could provide the Special Master with as much information as possible in support of the request for an extension. Florida indicated only that it was almost finished producing documents but did not inform us that yet another sizable production would be made on the day of the joint submission. Friday's production means that Florida has now produced nearly 1.4 million pages of documents in October alone and approximately 2 million pages in the last 7 weeks. Georgia has requested in separate correspondence this morning that Florida identify how many pages it has left to produce, who the custodians are, and what percentage of its total review remains.

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For the Special Master's reference and so you have the full picture, here are the figures for Florida's productions in September and October:

September 4	672,203 pages
September 29	6,219 pages
October 2	569,808 pages
October 12	129 gigabytes of data
October 16	570,357 pages
October 23	197,531 pages

This means that approximately 65% of Florida's overall production has been made in the last seven weeks, making it extremely difficult to schedule and prepare for depositions. Also, since Florida mentioned the burden associated with university productions in our joint submission, we thought it important to inform the Court that since September 1, Georgia has received more than 1.4 million pages of documents from Florida universities on top of the 2 million pages that have been produced by Florida itself.

While both parties are coping with the burdens of reviewing document productions as the discovery cutoff approaches, Florida and its universities have timed their productions so as to require Georgia to review 3.4 million pages of documents in the last 7 weeks alone. Neither party should receive an advantage in this litigation by timing its production to preclude meaningful review prior to depositions. The issues are too important and the stakes for Georgia are too high. Georgia therefore respectfully reiterates its request for additional time to review this information in preparation for upcoming depositions.

Sincerely,



Craig S. Primis, P.C.

cc: Philip J. Perry, Esq.