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April 1, 2004

**CONFIDENTIAL**

Mr. Scott Larsen  
Kaiserslauterer Str 65  
6123 Saarbrucken  
Germany

**VIA ELECTRONIC MAIL**

Dear Mr. Larsen:

Thank you for your letter to me of March 28, 2004, and your subsequent correspondence of today. Unfortunately, your interpretation of the Protective Order and the documents on the Michigan Bar website is inaccurate.

The Texas Protective Order does encompass the Blakey Report and any one who is not a party to the lawsuit in possession of the report is in violation of that Order. The fact that this document was not stamped confidential in no way affects its protection under this Order. Both Amway and Procter & Gamble intended that the Report was to be kept confidential, as did the author, Professor Blakey. The Court ruled that this document was to be kept under seal and the Court's ruling is further reinforced by the Order signed by Judge Gilmore on March 3, 2004, allowing the parties to undertake discovery to determine how the report itself was disseminated and to enforce its Protective Order. For your review, I have attached a copy of Judge Gilmore's Order of March 3, 2004 for your review.

Your reading of the documents on the Michigan Bar website is partially correct in that the orders posted on the site reference the Blakey Report and the allegations contained therein. However, the website DOES NOT post a copy of this report and further indicates that the Blakey Report was "**kept at all times under seal.**" Having indicated that you learned of the Blakey Report on the Michigan Bar website from the posted Orders of Judge Scoville on that site, you have known from the beginning that this document was under seal and confidential. The mere knowledge of the existence of this report is not a violation of the Protective Order; however, **having a copy of the report and publishing it to the public is a violation of the Federal District Court's Protective Order.** Therefore, we must assume, based upon your statements that you knowingly violated the Court's Protective Order by publishing the Blakey Report that had been sealed by the U.S. District Court.

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We understand that you received your copy of the confidential Blakey Report from [www.webraw.com/quixtar](http://www.webraw.com/quixtar). The Blakey Report has been removed from that site in compliance with the Protective Order. We again request that you remove the report from your website as well.

Finally, since you have indicated that you have obtained counsel, I am sure that he can provide you with the case law and research you are seeking. As counsel for Amway, I am not in a position to provide you with legal opinions or research. If you would prefer that I communicate directly with your attorney, please advise me of his name, address and telephone number.

I look forward to hearing from you and/or your counsel regarding your intentions in this matter as it will affect our future actions regarding this issue.

Very truly yours,

*JACKSON WALKER L.L.P.*

  
Richard E. Griffin

REG:jrv

Cc: [sales@1st-amendment.net](mailto:sales@1st-amendment.net)