

# **EXHIBIT K**

## Wheatley, Christopher Thomas

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**From:** Lawn, Alan  
**Sent:** Thursday, December 4, 2025 7:10 PM  
**To:** 'Jeff.Butler@CliffordChance.com'; Casas, Antonio J.; Longo, Kim; Simon, Howard  
**Cc:** Sanaz.Payandeh@CliffordChance.com  
**Subject:** RE: Picard v. BIL

Jeff,

We acknowledge receipt of your letter and are reviewing your responses. Putting aside issues on which you appear to be refusing to engage in any further discussions, your letter completely ignores two previously unaddressed issues that we ask that you immediately address: (1) your client's overdue document productions, which you represented to the Court were ready to start going out months ago, and our specific request that you let us know when you expect to make the next production and to complete the productions; and (2) issues we raised months ago regarding your clients' interrogatory answers, and their signed verifications to those answers, which we have been waiting for since last December.

Regards,  
Alan

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**From:** Jeff.Butler@CliffordChance.com <Jeff.Butler@CliffordChance.com>  
**Sent:** Wednesday, December 3, 2025 4:23 PM  
**To:** Casas, Antonio J. <acasas@windelsmarx.com>; Longo, Kim <klongo@windelsmarx.com>; Simon, Howard <hsimon@windelsmarx.com>; Lawn, Alan <alawn@windelsmarx.com>  
**Cc:** Sanaz.Payandeh@CliffordChance.com  
**Subject:** Picard v. BIL

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Please see the attached letter.

Regards,

Jeff E. Butler  
Partner

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