



State of North Carolina

Department of Justice
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Reply to: James C. Gulick
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ROY COOPER
ATTORNEY GENERAL

August 20, 2008

By e-mail and first class mail

Special Master Kristin L. Myles
Munger, Tolles & Olson, LLP
560 Mission Street, 27th Floor
San Francisco, CA 94015

**RE: *South Carolina v. North Carolina*, No. 138, Original; North Carolina's
Progress Report No. 6**

Dear Special Master Myles:

North Carolina submits this Progress Report in connection with the conference call of August 22, 2008. North Carolina and South Carolina have conferred twice regarding the production of information in response to the parties' document production requests. The States have agreed to conduct another "meet and confer" telephone conference and have agreed to exchange certain information regarding the collection of electronic data and documents, including search terms used to identify responsive information. The States have also discussed an agreement to present to the Special Master to address inadvertent disclosure of attorney-client privileged, attorney work product or other protected information in this matter.

Sincerely,

A handwritten signature in black ink that reads "James C. Gulick". The signature is written in a cursive style with a large, sweeping initial "J".

James C. Gulick
Senior Deputy Attorney General

cc: All Counsel of Record