Brekka & Brekka

ATTORNEYS AT LAW
32 MAIN STREET
P.O. BOX 515

HUBBARDSTON, MASSACHUSETTS 01452

KENNETH L. BREKKA CLARE FRAIN BREKKA (978) 928-5000 FAX (978) 928-5085 WORCESTER (508) 752-0500

November 2, 2000

Kenneth M. Homsey, Esq. 300 Essex Street
Lawrence, MA 01840-1411

RE: Michael Elbery

Dear Attorney Homsey:

As per your request, I need access to the Mobil station to do the following:

- 1. Take pictures of the inside of the store and back room.
- 2. Examine the video taping equipment in the store. I need to determine how the video taping machine operates and to confirm that the instructional manual I received from Sony matches the machine located at the store.
- 3. I need a copy of Mobil's security manual for managers which relates to the proper procedures to follow with respect to video system surveillance.
- 4. I need the name, address and phone number of the Mobil employee with final decision making authority who can testify regarding Mobil's established procedures in running the video surveillance system. The person must have complete knowledge of the video system at Mobil.
- 5. I also need a copy of any written policies dealing with drunk and unruly customers.

We need Mobil's cooperation in this matter. Please call me as soon as possible so that we can arrange a time for me to complete my investigation.

Very truly yours,

Kenneth L. Brekka, Esq.

KLB/mf

via: FAX/1st Class Mail

cc: Michael Elbery