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Attorney

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Bob O'Connor, CEO
OKPI
P.O/ Box 40067
Memphis, TN 38174

Dear Bob:

You asked me about my experience with Jeff Reynolds during my time as in-house counsel handling litigation for Amoco and BP for 19 years. I am happy to respond to your request. I worked with many good attorneys over that time. None of them surpassed Jeff Reynolds in putting my client's interests first. He chalked-up some excellent results for us, occasionally to his financial detriment.

Jeff was very efficient and a good steward of our money. He was one of only a very few outside attorneys with whom I felt comfortable managing our litigation with very little oversight. He understood and tenaciously pursued our objectives. While his work was very impressive, he didn't "try to impress" by flooding me with needless or overly expansive communication. Jeff had a very successful motion-practice track-record with us. His straightforward logic convinced me, and a number of courts, that plaintiffs' claims were lacking on various procedural and substantive grounds resulting in early dismissal or favorable settlement of cases. To my client's benefit, and to Jeff's own detriment, he brought surprisingly swift conclusion to cases; bringing an unexpected early end to his own legal fees on those matters.

I never felt my client was being billed in order to educate Jeff's subordinates or bring them up to speed. He discussed the merits of bringing in junior attorneys to work on various cases and ensured that any agreed-upon work by others was efficient and in my client's best interest.

Over the years, I learned that many, if not most, defense attorneys, both in-house and outside counsel, hedged when asked about a client's chances of prevailing, whether on a motion or on a case. I (or co-defendants) would almost always get answers in the thirty to seventy percent probability range; even on matters which were knowledgeably perceived to be much higher or lower probability. It was as if outside counsel didn't want to provide a probability so

low that a matter would not be pursued, or give a probability so high that an adverse ruling or judgment would be "held against them" if success was not achieved.

Jeff was one of very few attorneys who worked successfully with me on these "probabilities". I paid him for his expert legal opinions and advice, not to make business or litigation decisions. He didn't sugarcoat bad news. Likewise, he didn't hesitate to tell me when he believed we had a ninety percent chance of success on a matter. With good reason, I learned to trust his analysis and predictions.

Jeff was very effective in the courtroom. He was tough and convincing. Juries believed him and appreciated the clear way he painted a logical story for them to understand. I believe Jeff was the first oil company defense counsel to successfully go toe-to-toe with Stuart H. Smith, the much publicized NORM king.

Not being able to continue working with Jeff is one of the few downsides of my retirement. Years ago, I stated a desire to have Mr. Reynolds cloned. While I no longer need Jeff's services, others that follow would greatly benefit by having a lot of Jeff Reynolds available to assist them. Let me know if I can provide you with additional information regarding Mr. Reynolds.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn B. Galt". The signature is written in a cursive, flowing style with some loops and flourishes.