

# EXHIBIT P

**Morris, Francis**

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**From:** Jeffrey Patterson [jeffrey.patterson@nelsonmullins.com]**Sent:** Friday, January 7, 2011 2:10 PM**To:** Morris, Francis**Subject:** Michaels Case

Mr. Morris: Following up on our discussion last week, we have reviewed the issue regarding document production and we still see no benefit to any party of producing documents regarding the prior denial when Wells Fargo has already agreed to process your client for a new modification. As a result, we think it would be a waste of time and money and not in compliance with the Court's direction to spend time gathering documents and information regarding a past denial when we have already agreed to conduct a new review. Of course, we cannot complete this new review now because your client refuses to produce documents and information required by HAMP. While we do not believe your client can be compelled to submit documents for a HAMP modification, we do feel that we need to let the Court know that we cannot proceed any further with the modification given your client's refusal to provide the documents required by the HAMP directives. We will file a notice with the Court to that effect. Let me know if you have any questions.

## **Nelson Mullins**

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1/7/2011