REQUEST FOR PROPOSALS FOR SPECIAL LITIGATION COUNSEL ISSUED BY THE STATE OF DELAWARE Bid Number: LGL1301 Bid Closing: September 20, 2013

Question 1: Does the RFP contemplate that the firm chosen will be responsible for arguing the State Defendants' position at the hearing on the Motion for a Preliminary Injunction?

Answer 1: Yes, if there is one.

Question 2: Does the RFP contemplate that the firm chosen will be responsible for all discovery of electronically stored information?

Answer 2: Yes, if there is any electronically stored information that has not already been furnished to the State's third-party auditor.

Question 3: In connection with the RFP's questions on "Vendor's Prior Experience," are you primarily interested in the experience of the firm or of the individual lawyers proposed for the team?

Answer 3: The State is primarily interested in the experience of the individual lawyers proposed for the team.