

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA  
(Civil Division)

3D GLOBAL SOLUTIONS, INC.	)	
	)	
Plaintiff	)	
	)	
v.	)	Civil Action No. 1:06-CV-722(GK)
	)	
MVM, INC.	)	
	)	
Defendant	)	
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**RESPONSE TO NOTICE FOR PRODUCTION**

The Responding Party, 3D Global Solutions, by and through its attorneys, hereby responds to the Notice for Production of Documents submitted by the Requesting Party on November 10, 2009, as set forth below.

PLEASE TAKE NOTICE that the inadvertent production or disclosure of any material that may be privileged or subject to work product protection shall not constitute a waiver of any applicable privilege. Nor shall such production or disclosure be deemed a waiver of the right to interpose any applicable objections at any time, including but not limited to objections such as competency, relevancy or materiality.

**Response to request No. 1**

Paragraph B(5) of the agreement for recruiting services does not refer to language qualifications and the agreement for recruiting services dated September 26, 2005, does not include an exhibit B. Nonetheless, to the extent that the request for emails letters and other documentation relating to English language testing of TCNs remains, 3D Global does not possess any documentation related to testing of TCNs. Furthermore, 3D objects to documents related to State Department criteria. 3D did not interact with the State Department and was not required to coordinate with the State Department on this contract.

**Response to request No. 2**

None exist. MVM, Inc. did not establish an English language proficiency criteria for TCNs working in Kabul. Therefore, 3D Global does not possess documents related to English language criteria for use by Wackenhut, South America.

**Response to request No. 3**

None Exist

**Response to request No. 4**

None exist.

**Response to request No. 5**

None exist

**Response to request No. 6**

Schedule of Kabul supporting staff names attached.

3D Global does not have any contact information on Wackenhut support personnel used in Kabul.

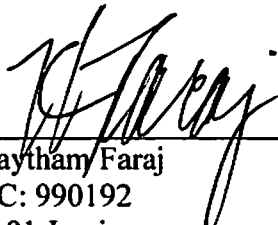
**Response to request No. 7**

None exist

**Response to request No. 8**

Please contact counsel for 3D Global to coordinate a time and place to review or make copies of security personnel files.

Dated: December 9, 2009

  
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*Attorney for 3D Global Solutions Inc.*

**Administrative staff support scheo**

Names	10.oct.05	11.oct.05	12.oct.05	13.oct.05	14.oct.05	15.oct.05	16.oct.05	17.oct.05	18.oct.05	19.oct.05	20.oct.05	21.oct.05	22.oct.05
1 Ena Basaldúa	14	10	10	14	10	10	6						14
2 Norma Rubio	14	10	10	14	10	10	6						14
3 Bertha Huertas	14	10	10	14	10	10	6						14
4 Silvia Robinson	14	10	10	14	10	10	6						14
5 Maria Esperanza	14												14
6 Maria Rosa Ordoñez	14	10	10	14	10	10	6						14
7 Betty Chia	14	10	10	14	10	10	6						14
8 Melissa Almora	14	10	10	14	10	10	6						14
9 Marcelo Jaime		10	10	10	10	8							14
10 Jose Reyna					10								14
11 Luis Flores					10								14
12 Maritza Chavez	14	10											14
13 Gisella Cerdan	14	10	10	14	10	10	6						14
14 Isaura Marca	14	10	10	14	10	10	6						14
15 Elisa Barreto	14	10	10	14	10	10	6						14
16 Lilliana Huamán	14	10	10	14	10	10	6						14
17 Kassandra Miranda	14												14
18 Yennyfer Bejarano		8	8	8	8								14
19 Rosa Cerdan													14
20 Paola Vargas													14
21 Karen Calderon													14
<b>Total</b>	<b>196</b>	<b>128</b>	<b>118</b>	<b>172</b>	<b>118</b>	<b>138</b>	<b>66</b>	<b>238</b>	<b>204</b>	<b>238</b>	<b>238</b>	<b>170</b>	<b>294</b>

The average of admin supporting staff per day is 15, increasing on weekends.

**lule: Kabul / NATO Project**

23.oct.05	24.oct.05	25.oct.05	26.oct.05	27.oct.05	28.oct.05	Pendiete	Hours worked	Hourly Fee	Total
12						4	104	8.00	832.00
12						4	104	8.00	832.00
12	14	12	14	12	14		230	8.00	1,840.00
12	14	12	14	12	14		230	8.00	1,840.00
14	14	12	14	12	14		172	8.00	1,376.00
12	14	12	14	12	14		220	8.00	1,760.00
12	14	12	14	12	14		220	8.00	1,760.00
12	14	12	14	12	14		220	8.00	1,760.00
	14	12	14	12	14		192	8.00	1,536.00
12							36	8.00	288.00
12							36	8.00	288.00
12	14	12	14	12	14		180	8.00	1,440.00
12	14	12	14	12	14		230	8.00	1,840.00
12	14	12	14	12	14		230	8.00	1,840.00
12	14	12	14	12	14		230	8.00	1,840.00
12	14	12	14	12	14		230	8.00	1,840.00
12	14	12	14	12	14		170	8.00	1,360.00
12	14	12	14	12	14		188	8.00	1,504.00
12	14	12	14	12	14		156	8.00	1,248.00
12	14	12	14	12	14		156	8.00	1,248.00
12	14	12	14	12	14		156	8.00	1,248.00
<b>242</b>	<b>238</b>	<b>204</b>	<b>238</b>	<b>204</b>	<b>238</b>	<b>8</b>	<b>3,690</b>		<b>29,520.00</b>