

**EXH. V**

**From:** [Grob, William E.](#)  
**To:** [Lillard, Samuel \(Sam\) N.](#); [Karseboom, Kimberly R.](#)  
**Subject:** FW: Mphasis.it.com WIP  
**Date:** Saturday, April 12, 2025 8:48:57 AM  
**Attachments:** [image001.png](#)

---

**William E. Grob | Ogletree Deakins**

100 North Tampa Street, Suite 3600 | Tampa, FL 33602 | Telephone: 813-221-7228  
[william.grob@ogletree.com](mailto:william.grob@ogletree.com) | [www.ogletree.com](http://www.ogletree.com) | [Bio](#)

---

**From:** Albert Rojas <albert.rojas@mphasis.it.com>  
**Sent:** Saturday, April 12, 2025 7:52 AM  
**To:** Grob, William E. <William.Grob@ogletreedeakins.com>; nitin.rakesh@mphasis.com  
**Cc:** bkellypi@aol.com; Kathryn Terry <Kathryn.Terry@mphasis.com>; Vinod Kumar09 <Vinod.Kumar09@mphasis.com>; Jitendra Borkar <Jitendra.Borkar@mphasis.com>; Shannon Mostafazadeh <shannon.mostafazadeh@mphasis.com>; Mirza Ali <ali.mm@mphasis.com>; ruturaj.waghmode@mphasis.com; Albert Rojas <albert.rojas@mphasis.it.com>; r A <rojas.albert@gmail.com>  
**Subject:** Re: Mphasis.it.com WIP

**[Caution: Email received from external source]**

---

This is looking pretty solid with PDF documents.  
If I catch any of you on the street... just know I'll hold you accountable to the fullest extent of the law.

Al Rojas

Creator: <https://mphasis.it.com/>

**Nitin** – I've always thought you were a solid guy, especially for welcoming me into the office that first day when all I had was my Brompton bike.  
In my opinion, it's time you passed that same spirit and swag on to your team.

**LEGAL BRIEF**

**Subject:** Whistleblower Retaliation, Compliance Violations, and Age Discrimination — Plaintiff v. Mphasis Ltd.

**I. EXECUTIVE SUMMARY**

This matter centers on a senior technologist employed by Mphasis who, while supporting a high-profile initiative for client QBE, raised urgent internal concerns regarding systemic noncompliance, data security lapses, and unauthorized use of proprietary technology. Despite making good-faith disclosures through Mphasis's Office of Ethics and Compliance (OEC) and Whistleblower channels between **November 20–22, 2024**, Plaintiff was retaliated against, denied standard IT resources, and ultimately terminated under questionable circumstances. The core events can be succinctly summarized by Plaintiff's paraphrased account:

**"Let me get this straight, Ruturaj:**

You didn't like George's 66-slide deck, so you gave it to the new guy—knowing he had no Mphasis laptop—and told him to fix it over the weekend. You bypassed security, pulled it from SharePoint, and sent it to his personal email.

He trimmed it to 8 pages for QBE. You didn't like that either. Called him a *'60s programmer'* and dumped another 66-slide Lucid deck on him.

Then security flags him for using his Mac—and you, Shannon, Charles and Jitendra fire him?"

This narrative underscores a disturbing sequence of disregard for compliance, ethics, and human capital. The facts establish credible claims under **Sarbanes-Oxley (SOX)**, **Dodd-Frank**, and relevant state and federal whistleblower and labor protection statutes.

## **II. PLAINTIFF'S BACKGROUND**

Plaintiff is an information technology expert with over 30 years of experience, including service within the U.S. Department of Defense Cybersecurity Division. Protecting digital assets and ensuring policy compliance are intrinsic to his professional identity.

He joined Mphasis in October 2024 after being recruited while working independently. Upon assignment to the QBE project, one of Mphasis's largest accounts, Plaintiff was **denied a company-issued laptop**, in violation of standard provisioning policies. This created immediate and ongoing exposure to security and regulatory risks.

## **III. KEY CONTRIBUTIONS**

- **December 2024:** Enhanced document decoding efficiency for QBE by integrating a large language model (LLM) with a linguistic engine, reducing processing time from 35 seconds to under 2 seconds—without compromising accuracy.

## **IV. WHISTLEBLOWER RETALIATION & COMPLIANCE VIOLATIONS**

**November 20–22, 2024:** Plaintiff formally submitted complaints to Mphasis's OEC and Whistleblower teams, flagging:

- Lack of a corporate-issued laptop, forcing use of personal hardware.
- QBE's non-compliance with its Acceptable Use Policy.
- Disparate treatment and contradictory instructions from management.
- Unapproved use of his proprietary technologies by Mphasis and QBE.

Following his disclosures:

- Plaintiff was pressured into withdrawing his whistleblower complaint.
- He continued to experience escalating hostility from management.
- His access to tools and systems remained restricted, impairing his job performance.
- He was terminated shortly after, under false pretext.

**Notable Supporting Communications:**

- Internal emails confirming Mphasis refused to issue him a laptop.
- Plaintiff's emails detailing security concerns and IP violations.
- OEC and Whistleblower formal submissions.
- Rejections and dismissive responses from management.
- Screenshots of error messages and policy violations.

## **V. AGE DISCRIMINATION**

Plaintiff, over age 60, became the subject of inappropriate comments and behavior:

• **March 7, 2025:** During a team meeting, Raturaj Waghmode shared images of dinosaurs in apparent reference to Plaintiff's age. • **March 12, 2025:** The Mphasis Chief Risk Officer (CRO) asked about Plaintiff's age and referred to him as a "programmer from the 60s." Despite raising formal complaints about this behavior, Plaintiff faced a sudden reduction in responsibilities, warnings for procedural adherence, and eventually account lockout and termination.

## VI. RETALIATORY ACTIONS & TERMINATION

- **Feb–Mar 2025:** Plaintiff's work for QBE intensified, including tasks over weekends, despite lack of proper tools.
- **Mar 12, 2025:** Plaintiff pushed back on narrowing the scope of a CRO-led investigation and was immediately reprimanded.
- **Mar 14, 2025:** Plaintiff was terminated without valid cause.
- **Mar 15, 2025:** Mphasis legal counsel initiated a purported investigation, post-termination.

Claims of unauthorized international work were refuted with written managerial approval for Plaintiff's travel to London and Cannes.

## VII. LEGAL IMPLICATIONS

The totality of the evidence supports claims including, but not limited to:

- **Whistleblower Retaliation** (SOX, Dodd-Frank)
- **Constructive Discharge**
- **Wrongful Termination**
- **Age Discrimination** (ADEA, state statutes)
- **Improper Use of Intellectual Property**
- **Violation of Internal Compliance and IT Security Policies**

## VIII. CONCLUSION

This is a textbook case of an employer mishandling protected disclosures while penalizing the employee who raised them. Mphasis not only failed to uphold its legal and ethical obligations—it actively created a hostile environment, withheld standard equipment, mocked the Plaintiff's age, and punished his diligence.

Plaintiff seeks full remedy under applicable statutes for retaliation, discrimination, and damages stemming from Mphasis's actions and omissions.

**Prepared by:** Confidential Counsel to Plaintiff **Date:** April 12, 2025

PDF Downloads

[31 Oct - 22 NOV 2024 Whistleblow QBE Mphasis laptop policy \(pdf\)Téléchargement](#)

[01 Nov 2024 QBE & Mphasis emails \(pdf\)Téléchargement](#)

[17 Dec Dean dual laptops \(pdf\)Téléchargement](#)

[17-18 Dec FW\\_ Mphasis Laptop ## REQ0134355 \(pdf\)Téléchargement](#)

[07 -09 Feb 2025 Fw\\_ London Visit, MDU Demo & AI Cannes Festival 13-15 Feb \(pdf\)Téléchargement](#)

[28 Feb 2025 QBEweekend \(pdf\)Téléchargement](#)

[28 Feb 2025- Fw QBE draft deck \(pdf\)Téléchargement](#)

[05 Mar 2025 Gmail - Fw\\_-\[Update\] AI Tools - Discussion \(pdf\)Téléchargement](#)

[07 Mar 2025 - Clarification Needed on Project Changes.pdf \(pdf\)Téléchargement](#)

[12 -13 Mar Re\\_Potential DLP Incident- DR110325111903 \(pdf\)Téléchargement](#)  
[14 Mar - Termination notification 2617478 Albert Rojas \(pdf\)Téléchargement](#)  
[15 Mar Albert Rojas Violation of Contractual Agreements \(pdf\)Téléchargement](#)  
[03 Apr Letter advising of representation of Mphasis \(pdf\)Téléchargement](#)

On Apr 11, 2025, at 11:15 pm, Albert Rojas <[albert.rojas@mphasis.it.com](mailto:albert.rojas@mphasis.it.com)> wrote:

Bill,

Let's be clear: if Mphasis leadership hadn't actively blocked me, there would have been no need for me to create the **Mphasis.it.com** domain.

To this day, I still have the QBE Dell laptop collecting dust in New York. No one from Mphasis or QBE has made *any* attempt—no FedEx return box, no communication, nothing—to retrieve it. That silence speaks volumes.

Now we're facing a trial over wrongful termination tied to protected actions and age discrimination—and everyone involved knows it.

See you in court.

**Albert**

<https://Mphasis.it.com>

Sent from my iPhone

From: **Grob, William E.** <[william.grob@ogletree.com](mailto:william.grob@ogletree.com)>  
Date: Fri, Apr 11, 2025 at 11:02 PM  
Subject: RE: End date for contract  
To: [rojas.albert@gmail.com](mailto:rojas.albert@gmail.com) <[rojas.albert@gmail.com](mailto:rojas.albert@gmail.com)>

Mr Rojas,

As I have instructed you repeatedly, immediately stop using any email impersonating Nitin Rakesh or any other personnel working for Mphasis. This behavior is fraudulent and likely criminal and has been reported to law enforcement. Additionally, immediately take down the [mphasis.it](https://mphasis.it) website and stop communicating with Mphasis clients.

Thank you,  
Bill Grob

**William E. Grob | Ogletree Deakins**  
[100 North Tampa Street, Suite 3600 | Tampa, FL 33602](https://www.ogletree.com) | Telephone: 813-221-7228  
[william.grob@ogletree.com](mailto:william.grob@ogletree.com) | [www.ogletree.com](https://www.ogletree.com) | [Bio](#)

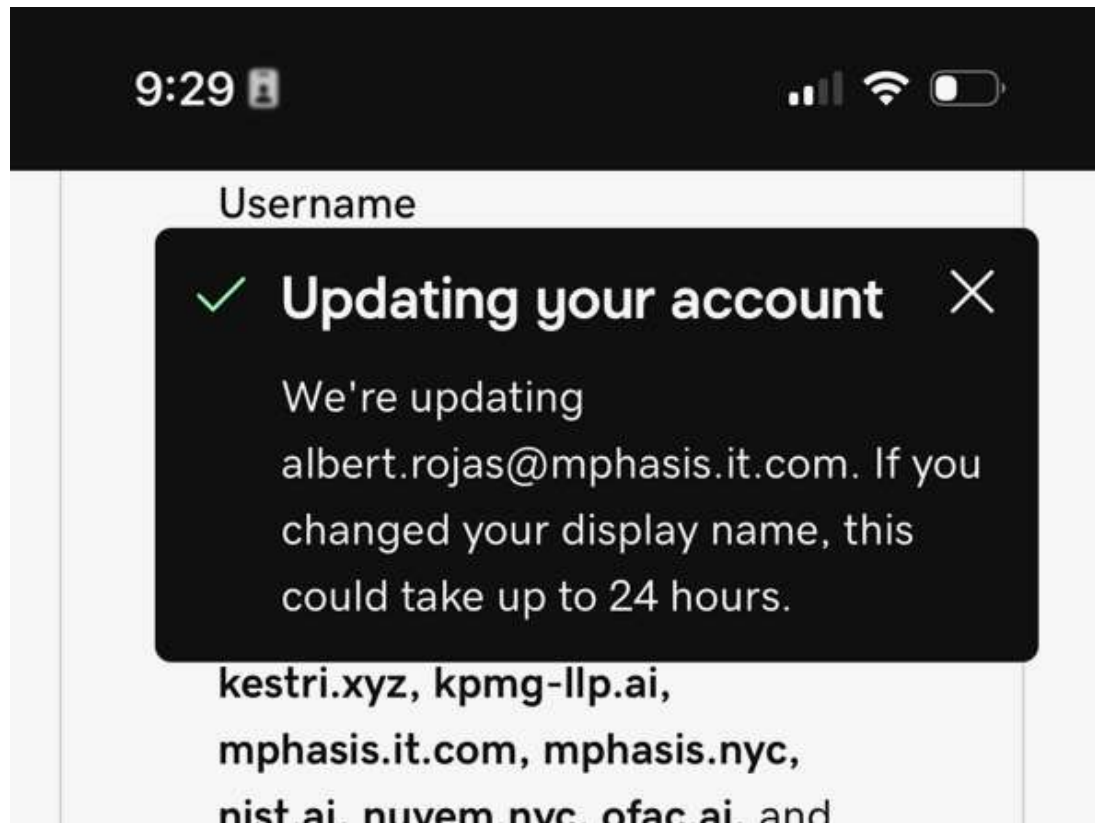
---

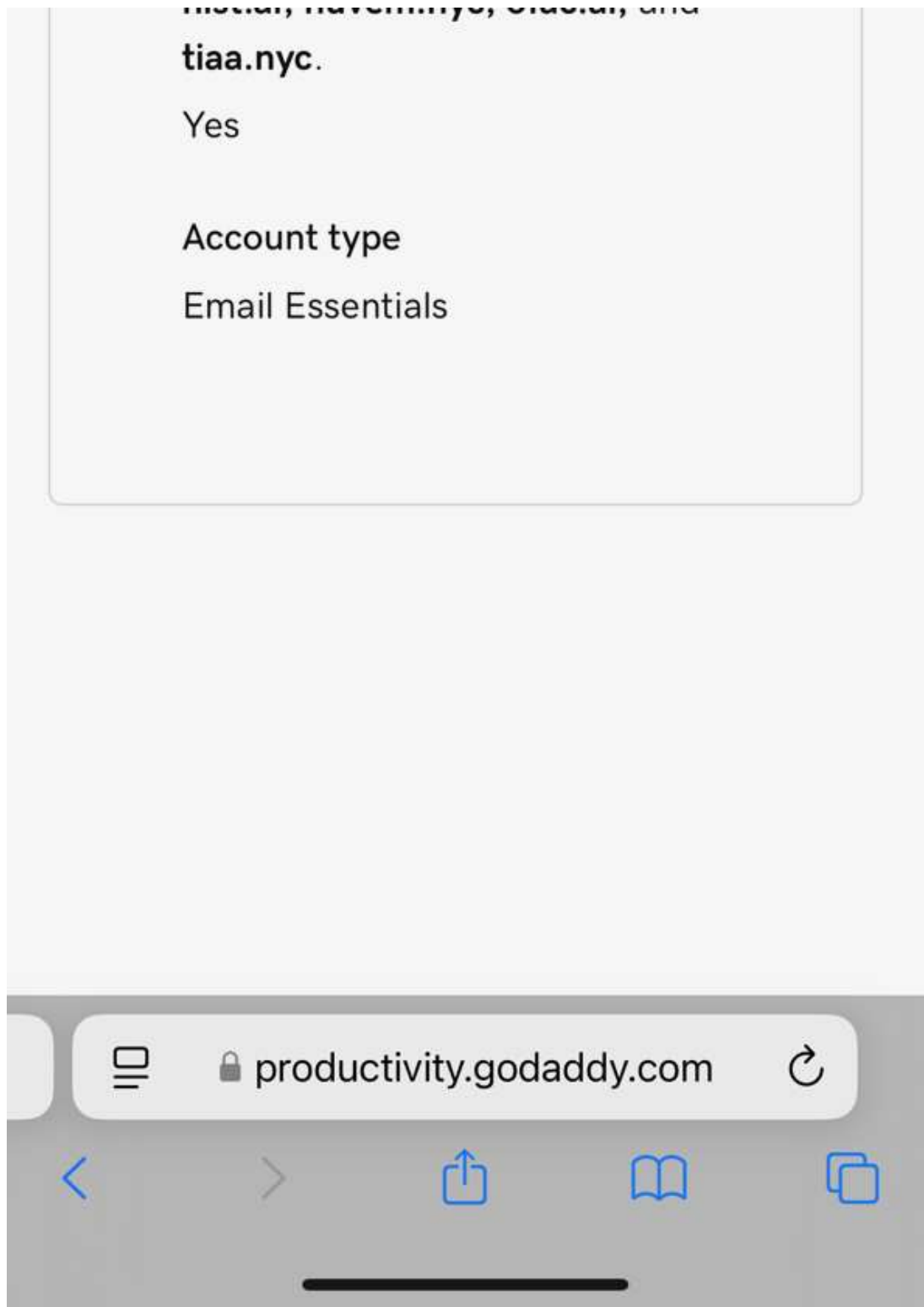
**From:** Albert Rojas <[albert.rojas@mphasis.it.com](mailto:albert.rojas@mphasis.it.com)>  
**Sent:** Friday, April 11, 2025 3:33 PM  
**To:** [bkellypi@aol.com](mailto:bkellypi@aol.com)  
**Cc:** Dilip Nayak <[dilip.nayak@qbe.com](mailto:dilip.nayak@qbe.com)>; Grob, William E. <[William.Grob@ogletreedeakins.com](mailto:William.Grob@ogletreedeakins.com)>; Kathryn Terry <[Kathryn.Terry@mphasis.com](mailto:Kathryn.Terry@mphasis.com)>; Vinod Kumar09 <[Vinod.Kumar09@mphasis.com](mailto:Vinod.Kumar09@mphasis.com)>; Jitendra Borkar <[Jitendra.Borkar@mphasis.com](mailto:Jitendra.Borkar@mphasis.com)>; Shannon Mostafazadeh <[shannon.mostafazadeh@mphasis.com](mailto:shannon.mostafazadeh@mphasis.com)>; [nitin.rakesh@mphasis.com](mailto:nitin.rakesh@mphasis.com); [rojas.albert@gmail.com](mailto:rojas.albert@gmail.com); Palavesam Chandrasekar <[Palavesam.Chandrasekar@qbe.com](mailto:Palavesam.Chandrasekar@qbe.com)>; Mirza Ali <[ali.mm@mphasis.com](mailto:ali.mm@mphasis.com)>; Albert Rojas <[albert.rojas@mphasis.com](mailto:albert.rojas@mphasis.com)>; [rojas.albert@gmail.com](mailto:rojas.albert@gmail.com)  
**Subject:** Re: End date for contract

[Caution: Email received from external source]

---

**Just a quick note — I'm in Cannes, and I want to make sure everyone knows it's me, Albert Rojas (not Nitin).** I had to use Nitin's name because my own was getting blocked, but I've signed every email as "Albert..." so I'm pretty sure that's been clear. Just wanted to avoid any confusion!





Sent from my iPhone

On Apr 11, 2025, at 9:01 PM, Nitin Rakesh  
<[nitin.rakesh@mphasis.it.com](mailto:nitin.rakesh@mphasis.it.com)> wrote:

Hey Brad,

Palavesam Chandrasekhar

([Palavesam.Chandrasekar@qbe.com](mailto:Palavesam.Chandrasekar@qbe.com)) is the QBE contact who insisted the laptop be returned in New York rather than London.

As I mentioned before, I don't believe QBE or Mphasis fully understands what transpired. What I *do* know is that QBE was taken advantage of—and I can prove it. The video at <https://Kestri.com> shows my system executing flawlessly in under a second, while the version on the right side stumbles for 30 seconds and even hallucinates when prompted about “data protection.”

Let me know if you'd like me to walk you through it.

Sent from my iPhone

On Apr 11, 2025, at 8:51 PM, A R  
<[rojas.albert@gmail.com](mailto:rojas.albert@gmail.com)> wrote:

Sent from my iPhone

Begin forwarded message:

**From:** Albert Rojas  
<[albert.rojas@qbe.com](mailto:albert.rojas@qbe.com)>  
**Date:** December 20, 2024 at  
9:39:14 PM GMT+1  
**To:** Dilip Nayak  
<[dilip.nayak@qbe.com](mailto:dilip.nayak@qbe.com)>  
**Cc:** Palavesam Chandrasekar  
<[Palavesam.Chandrasekar@qbe.com](mailto:Palavesam.Chandrasekar@qbe.com)>, Mirza Ali  
<[ali.mm@mphasis.com](mailto:ali.mm@mphasis.com)>, Albert  
Rojas <[albert.rojas@mphasis.com](mailto:albert.rojas@mphasis.com)>,  
Jitendra Borkar  
<[Jitendra.Borkar@mphasis.com](mailto:Jitendra.Borkar@mphasis.com)>  
**Subject: RE: End date for contract**

Copy.

I wanted to remind you of the promise  
I made to you and Palavesam. If the

current Legal NDA app doesn't meet the business's SLA requirements, feel free to use the solution I built for [DocNote.ai](#) as a starting point for decoding NDAs. It's cloud-agnostic and should be flexible enough for your needs.

Wishing you a Merry Christmas! When I return to New York in the new year, I'll drop off the QBE laptop at the QBE offices, unless I hear otherwise. It's been a pleasure working with the QBE team.

Kind regards,  
Albert

**QBE Entity.**

do start the process to return the **QBE** laptop assigned to you starting...leadership on how to return to the **QBE** location.~ Calling the service **Entity**.

**Return/ Destruction.**

please do start the process to **return** the QBE laptop assigned to you...the Mphasis leadership on how to **return** to the QBE location.~ Calling the **Destruction**.

■

---

**From:** Dilip Nayak  
<[Dilip.Nayak@qbe.com](mailto:Dilip.Nayak@qbe.com)>  
**Sent:** Friday, December 20, 2024 2:34 PM  
**To:** Albert Rojas  
<[Albert.Rojas@qbe.com](mailto:Albert.Rojas@qbe.com)>  
**Cc:** Palavesam Chandrasekar  
<[Palavesam.Chandrasekar@qbe.com](mailto:Palavesam.Chandrasekar@qbe.com)>;  
Mirza Ali <[ali.mm@mphasis.com](mailto:ali.mm@mphasis.com)>

**Subject:** End date for contract

AI – Due to funding changes for our application roadmap and role re-alignments we will need to do as a result, we will be ending the contract for your position ,in order to get you some notice and continued billing through the holidays , we have advised Mphasis that you can bill through Dec 31st. However please do start the process to return the QBE laptop assigned to you starting next week due to the holidays and please co-ordinate with the Mphasis leadership on how to return to the QBE location. Calling the service desk for a pre paid shipping label is also a option.

I thank you for some of the observations you have provided us on the Q-GPT application. Best wishes on your onward journey. Hope you picked up some neat Azure skills !

Regards

---

Dilip Nayak  
Group Product Manager – Gen AI  
M) 952-452-1067

[Website](#) [LinkedIn](#) [Twitter](#)

<image001.png>

*This electronic message from QBE North America and any attachment to it is intended exclusively for the individual or entity to which it is addressed. It may contain information that is privileged, confidential and exempt from disclosure under applicable law. Any unauthorized disclosure, copying, distribution or use of this electronic message or any attachment is prohibited. If you have received this message in error, please return it to the sender and delete this original from your system.*

*This transmission is intended only for the proper recipient(s). It is confidential and may contain attorney-client privileged information. If you are not the proper recipient, please notify the sender immediately and delete this message. Any unauthorized review, copying, or use of this message is prohibited.*