

EXHIBIT HH

From: [A R](#)
To: bkellypi@aol.com; Palavesam.Chandrasekar@qbe.com; [Dilip Nayak](#)
Cc: [Albert Rojas](#); [A R](#); [Grob, William E.](#); [Karseboom, Kimberly R.](#)
Subject: Fwd: Fw: [External] Re: End date for contract Dec 31, 2024 - Follow-Up: Legal NDA App and Supporting Exhibits
Date: Friday, April 18, 2025 4:13:45 AM
Attachments: [image001.png](#)
[4Dilip.xlsx](#)
[Mphasis v. Rojas \(4.16.25\).pdf](#)

[Caution: Email received from external source]

Brad — time to play detective. Please get QBE to confirm:

Are they sending me a FedEx label and box to return the Dell laptop to their warehouse, or not? I've been told conflicting answers for months. I've also offered to drop it off at the QBE NY office, but every time I get a "No."

Palavesam and Dilip —

Attached is the spreadsheet (*4Dilip.xlsx*) detailing the system-generated errors I personally corrected. These are the same kinds of failures you get when you try to ship an NDA to an LLM — like flying east to get to Hawaii.

Also attached is a lawsuit I suggest you both read carefully.

Here is the video documenting my efforts tuning your system: <https://www.youtube.com/watch?v=QulAEmBGEec>
It speaks for itself. My turn is next.

I know this isn't personal. But let's be clear: you brought me in to fix the problems. I did. You chose to stay in bed with Accenture. That's fine — the court will see that choice for what it is.

Submitted under penalty of perjury,

Albert in Cannes.

P.S. <https://DocNote.ai> just signed its first client.

P.P.S. As soon as someone emails me a FedEx label and box, the QBE Dell will be shipped. The fact that it's taken 4 months says everything.

----- Forwarded message -----

From: **Albert Rojas** <albert.rojas@mphasis.com>

Date: Sun, Dec 22, 2024 at 3:42 PM

Subject: Fw: [External] Re: End date for contract Dec 31, 2024 - Follow-Up: Legal NDA App and Supporting Exhibits

To: rojas.albert@gmail.com <rojas.albert@gmail.com>

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From: Albert Rojas <albert.rojas@mphasis.com>

Sent: Sunday, December 22, 2024 2:40 PM

To: Palavesam Chandrasekar <Palavesam.Chandrasekar@qbe.com>; Dilip Nayak <Dilip.Nayak@qbe.com>

Subject: Re: [External] Re: End date for contract Dec 31, 2024 - Follow-Up: Legal NDA App and Supporting Exhibits

Copy. I was going to stop by QBE London office tomorrow and ask for permission to mail it to New York QBE.

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From: Palavesam Chandrasekar <Palavesam.Chandrasekar@qbe.com>

Sent: Sunday, December 22, 2024 2:33:35 PM

To: Albert Rojas <albert.rojas@mphasis.com>; Dilip Nayak <Dilip.Nayak@qbe.com>

Subject: [External] Re: End date for contract Dec 31, 2024 - Follow-Up: Legal NDA App and Supporting Exhibits



Exercise caution – External Mail.

Hi AL

You have to drop off the laptop in the office you picked it from. These are leased equipment.

[@Dilip Nayak](#) please inform Mphasis on this

Thanks

Palavesam

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From: Albert Rojas <albert.rojas@mphasis.com>

Sent: Sunday, December 22, 2024 8:06:22 AM

To: Dilip Nayak <Dilip.Nayak@qbe.com>; Palavesam Chandrasekar <Palavesam.Chandrasekar@qbe.com>

Subject: Fw: End date for contract Dec 31, 2024 - Follow-Up: Legal NDA App and Supporting Exhibits

This email was sent from someone outside of QBE. Be cautious opening links and attachments. Use the 'Report Phishing' button if suspicious.

Hey!

The QBE laptop is locked, so I've picked up a Mac and am preparing for some travels around Europe. I'm planning to drop off the QBE laptop at the QBE London office tomorrow Monday.

On another note, what Accenture built is really suboptimal. You can achieve the same functionality with the Legal NDA using the approach I showed you with the Auto app and a simple prompt—without the exorbitant costs of Azure Search and those static 1,000-token chunks♂.

Wishing both of you and your families a wonderful Christmas. It goes so fast so enjoy every moment.

Sincerely,

Albert

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From: Albert Rojas <albert.rojas@mphasis.com>

Sent: Sunday, December 22, 2024 10:28 AM

To: Jitendra Borkar <Jitendra.Borkar@mphasis.com>; Nitin Bansode <Nitin.Bansode@mphasis.com>; Mirza Ali <ali.mm@mphasis.com>

Subject: End date for contract Dec 31, 2024 - Follow-Up: Legal NDA App and Supporting Exhibits

Gents,

As my work with QBE concludes on December 31, I want to share a few important points and exhibits regarding my previous email (Fri, Dec 20, 2024, at 8:39 PM) with Dilip and the QBE team.

In that email, I mentioned:

"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."

Below are supporting exhibits that validate my concerns and recommendations:

1. **12/19/24 - QBE PM.jpeg**

The QBE Project Manager confirmed the errors we raised and acknowledged the work in progress.

2. **12/14/24 - 4DilipErrors.pdf**

Updated NDAs and feedback highlighting incorrect prompt responses. I reiterated that we should delay the app's release until it consistently delivers zero errors.

(Email timestamp: Sat, Dec 14, 2024, at 8:50 PM)

3. **12/01/24 - Screen Recording**

Demonstrates performance challenges and inconsistent prompt returns within the QBE Legal NDA app.

Please let me know if additional details or context are needed.

Cheers!
Albert

----- Forwarded message -----

From: **Albert Rojas** <Albert.Rojas@qbe.com>

Date: Sat, Dec 14, 2024 at 8:50 PM

Subject: RE: [Updated NDAs and Feedback on QBE Legal] QBE Christmas Holiday Hours

To: Dilip Nayak <Dilip.Nayak@qbe.com>

Cc: Mirza Ali <ali.mm@mphasis.com>, Nitin Bansode <Nitin.Bansode@mphasis.com>, Jitendra Borkar <Jitendra.Borkar@qbe.com>, Albert Rojas <albert.rojas@mphasis.com>

Hi Dilip,

I've submitted two NDAs through our QBE Legal system for your review. To ensure clarity, the second version is labeled *MPHASIS*. The relevant exhibits are attached for your reference.

I'd like to highlight that QBE Legal currently generates seven (7) incorrect prompt responses. In my view, we should delay its release until it consistently delivers zero (0) errors.

It has been an honor to serve you.

Respectfully,
Albert

On Fri, Dec 20, 2024 at 8:39 PM Albert Rojas <Albert.Rojas@qbe.com> wrote:

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](https://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>
Sent: Friday, December 20, 2024 2:34 PM
To: Albert Rojas <Albert.Rojas@qbe.com>
Cc: Palavesam Chandrasekar <Palavesam.Chandrasekar@qbe.com>; Mirza Ali <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](#)



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12:01:24 NDA Irvine Company LLC 2024-12-01

201825.mp4



12:14:24 4DilipErrors.pdf



12:19:24 QBE PM.jpeg

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