

# **EXHIBIT LL**

**From:** Legal  
**To:** Karseboom, Kimberly R.  
**Cc:** Grob, William E.; Lillard, Samuel (Sam) N.; nitin.rakesh@mphasis.com; andrew.horton@qbe.com; Dilip Nayak; palavesam.Chandrasekar; ruturaj.waghmode@mphasis.com; Jared.Bulger@mphasis.com; Balwinder Singh; Jitendra Borkar; Gururaj.Murthy@mphasis.com; Dean.Forrest@qbe.com; george.ioannou@mphasis.com; rA; bkellypi@aol.com; Legal  
**Subject:** Re: Shipping Label and Box Request for QBE Laptop  
**Date:** Tuesday, April 29, 2025 9:52:25 AM

[Caution: Email received from external source]

Dear Counselor,

As I previously informed Mr. Kelly, I can easily have my neighbor place the QBE Dell laptop into a box and apply a shipping label for return.

The persistent obstacles and irregularities surrounding this simple return process underscore why I previously raised concerns that QBE and Mphasis may be engaged in improper financial practices, potentially rising to the level of money laundering. Reputable global enterprises do not operate with this degree of disorganization and obfuscation.

Accordingly, I respectfully reiterate my request: please provide a FedEx shipping label and a box, as is standard practice for corporate asset returns, so that the laptop can be returned properly and expeditiously.

Submitted under penalty of perjury,

Albert Rojas

On Apr 29, 2025, at 3:44 PM, Karseboom, Kimberly R. <kimberly.karseboom@ogletree.com> wrote:

If you are in France, how will you send a laptop that is currently in NY? Respectfully, you cannot state you have been attempting to return it. You were told by QBE to arrange it with Mphasis. Mphasis retained our firm. We sent someone to retrieve the laptop based on an appointment you made with him by phone. You refused to give him the laptop "even if [you] were in New York." If we send you a label by email, when do you plan on mailing the laptop back? Where is this box supposed to be sent while you're in France?

**From:** Legal <legal@mphasis.cloud>  
**Sent:** Tuesday, April 29, 2025 9:35:32 AM  
**To:** Karseboom, Kimberly R. <Kimberly.karseboom@ogletreedeakins.com>; Grob, William E. <William.Grob@ogletreedeakins.com>; Lillard, Samuel (Sam) N. <sam.lillard@ogletreedeakins.com>; nitin.rakesh@mphasis.com <nitin.rakesh@mphasis.com>; andrew.horton@qbe.com <andrew.horton@qbe.com>; Dilip Nayak <dilip.nayak@qbe.com>; palavesam Chandrasekar <Palavesam.Chandrasekar@qbe.com>; ruturaj.waghmode@mphasis.com <ruturaj.waghmode@mphasis.com>; Jared.Bulger@mphasis.com <Jared.Bulger@mphasis.com>; Balwinder Singh <Balwinder.Singh@mphasis.com>; Jitendra Borkar <Jitendra.Borkar@mphasis.com>; Gururaj.Murthy@mphasis.com <Gururaj.Murthy@mphasis.com>; Dean.Forrest@qbe.com <Dean.Forrest@qbe.com>; george.ioannou@mphasis.com <george.ioannou@mphasis.com>  
**Cc:** r A <rojas.albert@gmail.com>; bkellypi@aol.com <bkellypi@aol.com>; Legal <legal@mphasis.cloud>  
**Subject:** Re: Shipping Label and Box Request for QBE Laptop

[Caution: Email received from external source]

Dear Ms. Karseboom,

Respectfully, your offer to send a courier to my apartment today is not feasible. As I informed Mr. Kelly on April 11, I am currently in France. This fact was clearly communicated during our call, yet it appears it has either been disregarded or not properly relayed.

Since December 2024, I have repeatedly requested a standard and simple solution: email me a FedEx shipping label and arrange for a box to be sent. This is consistent with common corporate practices for asset tracking and chain-of-custody management, and it avoids the unnecessary complications we are now facing.

QBE itself rejected informal drop-offs in both London and New York precisely because a formal shipping process is necessary to properly document the return. It remains the most efficient and professional way to complete this task.

Please confirm that you will provide a FedEx label and box so this matter can be resolved without further avoidable delays.

Respectfully submitted,  
 Albert Rojas

On Apr 29, 2025, at 3:12 PM, Karseboom, Kimberly R. <kimberly.karseboom@ogletree.com> wrote:

Mr. Rojas, it's curious you say you have been trying to return it and yet refused to provide it to Mr. Kelly on April 17. In any case, I can send a courier to your apartment today to retrieve it. What time works for you?

Sent from my iPhone

On Apr 29, 2025, at 2:55 PM, Legal <legal@mphasis.cloud> wrote:

**Dear Counselor,**

As a follow-up, any assistance from Mphasis or QBE in providing a FedEx shipping label and a suitable box for the return of the QBE Dell

laptop would be sincerely appreciated.

I have been attempting to complete this return since December 2024.

I currently maintain an apartment in New York City where desk space is limited, and having the appropriate materials would help expedite the return in an efficient and secure manner.

Thank you for your cooperation.

Submitted under penalty of perjury,

**Al Rojas**

Sent from my iPhone

On Apr 29, 2025, at 2:19 PM, Legal <legal@mphasis.cloud> wrote:

**Dear Counselor,**

I am not an attorney, but I am fully aware of my legal rights, including protections under federal and state law against retaliation, intimidation, interference, and obstruction.

I have also lawfully communicated with QBE employees regarding the laptop and related matters, as the property in question belongs to QBE, not Mphasis.

Any further attempts to interfere with these communications or to intimidate me will be documented and may be used to assert claims under applicable law.

I am preserving all rights and remedies at law and in equity.

**Govern yourself accordingly.**

**From:** "Karseboom, Kimberly R." <kimberly.karseboom@ogletree.com>  
**Date:** April 29, 2025 at 1:51:03 PM GMT+2  
**To:** Legal <legal@mphasis.cloud>, "Grob, William E." <William.Grob@ogletreedeakins.com>, "Lillard, Samuel (Sam) N." <sam.lillard@ogletreedeakins.com>  
**Cc:** r A <rojas.albert@gmail.com>, bkellypi@aol.com  
**Subject:** Re: Update: QBE.world Online — Mapping to Mphasis Domains and Equipment Return Status

Mr. Rojas,

This is the last warning. Stop contacting Mphasis employees.

Sent from my iPhone

On Apr 29, 2025, at 12:10 PM, Legal <legal@mphasis.cloud> wrote:

Dear Counsel and Stakeholders,

Please be advised:

- **QBE.world** is now live and actively maps to **mphasis.cloud**, **mphasis.nyc**, and **mphasis.it.com**, maintaining continuity of protected whistleblower disclosures.

Regarding the QBE-issued Dell laptop:

- On December 22, 2024, QBE's VP, Palavesam Chandrasekar, admitted confusion about return logistics, stating he was "not sure about UK" shipping and deferring to Mphasis leadership for further action.
- Despite repeated offers to coordinate the return, no shipping label or clear instructions were ever provided.
- Instead of facilitating the return, QBE and Mphasis escalated matters into retaliation and litigation based on factually unsupported allegations.

For full context, below is the December 22, 2024 email excerpt from Mr. Chandrasekar:

"@Albert Rojas Yes QBE will give you shipping within US not sure about UK. Please discuss with Mphasis leadership on their agreement on hardware with QBE.  
I don't enjoy your persistent smear on QBE application build with their partners... I don't want to hear or see any more email from you on any QBE application or partners."

The record reflects that:

- I never picked up the laptop in person—it was FedExed to my New York residence.
- I remained open to arranging return by personal delivery or through QBE's London offices.
- I actively sought resolution through multiple channels—including with QBE, Mphasis, and counsel—before being met with hostility and false accusations.

Given these facts, claims of unauthorized possession or misconduct are unsustainable and further support my affirmative defenses

of **unclean hands** and **retaliation**.

I remain open to good faith dialogue if the parties wish to deescalate unnecessary posturing.

Submitted under penalty of perjury,  
Albert Rojas  
(legal@mphasis.cloud)

On Apr 28, 2025, at 1:28 pm, Legal <legal@mphasis.cloud> wrote:

The Cybersecurity Paradox:  
Mphasis's Claims Under Scrutiny [\[1\]](#)  
mphasis.cloud

On Apr 25, 2025, at 11:31 am, Legal <legal@mphasis.cloud> wrote:

Response in progress from Cannes—this might be my favorite yet:

Given these facts, Plaintiff's claim that Defendant could have exfiltrated client data, confidential materials, or trade secrets—without provisioned access or hardware—isn't just implausible. It's embarrassing[1] for a company that markets itself as a leader in cybersecurity.

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[1] See Mphasis Corporation's own marketing on cybersecurity resilience, access governance, and data loss prevention. If Defendant, armed only with a personal MacBook, could bypass these so-called safeguards, Plaintiff's security posture warrants far broader scrutiny.

For the record, the only reason I have a copy of QBE.pptx attached is because Mphasis provided it to me.

I'm sharing this openly with Mphasis and QBE employees for full transparency and to help guide Mphasis's legal team toward a more fact-based, constructive approach.

Open to dialogue if this can help avoid further posturing.

Submitted under penalty of perjury,  
Albert

On Apr 22, 2025, at 7:49 pm, Legal <legal@mphasis.cloud> wrote:

Do what you need to do, Counselor.

For the record, I had half a dozen attorneys send me your Complaint last week—Case No. 25-cv-3175.

I appreciate that you listed all the Mphasis and QBE employees. I truly hope they help you get the record straight, because what you filed clearly reflects Unclean Hands.

Unclean Hands:  
Mphasis cannot claim contractual violations while simultaneously denying me the essential resources—laptop, internal systems access—required to meet those obligations. Their own misconduct bars enforcement.

On Apr 22, 2025, at 7:37 pm, Karseboom, Kimberly R.  
<kimberly.karseboom@ogletree.com> wrote:

Mr. Rojas,

I have been quite clear. You are not to email Mphasis employees as Mphasis is represented by Counsel. If you continue to do so, we will seek all available legal remedies.

If you have a response to the Complaint, please file it by the deadline or obtain counsel who will do so on your behalf. You have been formally and officially served as per the Court's Order.

**Kimberly R. Karseboom | Ogletree Deakins**  
599 Lexington Avenue, 17th Floor | New York, NY 10022 | Telephone: 212-492-2078  
[kimberly.karseboom@ogletree.com](mailto:kimberly.karseboom@ogletree.com) | [www.ogletree.com](http://www.ogletree.com) | [Bio](#)

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**From:** Legal <legal@mphasis.cloud>  
**Sent:** Tuesday, April 22, 2025 1:29 PM  
**To:** Karseboom, Kimberly R. <Kimberly.karseboom@ogletreedeakins.com>; Grob, William E. <William.Grob@ogletreedeakins.com>; Lillard, Samuel (Sam) N. <sam.lillard@ogletreedeakins.com>; nitin.rakesh@mphasis.com; andrew.horton@qbe.com  
**Cc:** Dilip Nayak <dilip.nayak@qbe.com>; palavesam Chandrasekar <Palavesam.Chandrasekar@qbe.com>; raturaj.waghmode@mphasis.com; Jared Bulger@mphasis.com; Balwinder Singh <Balwinder.Singh@mphasis.com>; Jitendra Borkar <Jitendra.Borkar@mphasis.com>; Gururaj.Murthy@mphasis.com; Dean.Forrest@qbe.com; rojas.albert@gmail.com

**Subject:** Return of QBE Property and Refutation of Mphasis Assertions

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

Counselor, let's be clear:

**Point 80:** No FedEx label or laptop box waiting for me in New York? I'll personally deliver the QBE Dell laptop to their Wall Street office next week. Simple.

**Point 127:** You claim I wasn't authorized to handle Mphasis property. Yet, how did I receive the QBE Draft Deck? Mphasis security monitors everything. Someone inside sent it to my personal account so I could complete their assignment—which I did. See attached: [250228 Raturaj Waghmode QBE Draft Deck].

**Points 131-132:** You allege unauthorized access under the Computer Fraud and Abuse Act—without me ever having a Mphasis laptop? Even your Senior U.S. Administrator, Jared Bulger, states:

"You can use personal machines, but you will be limited to WEB Version only... **ONLY Mphasis Domain Joined machines can use Desktop apps, which allow downloading and storing of Mphasis data.**"

(See Jared's email below.)

So, explain how I could have accessed or damaged systems I had no tools or authorization to reach. I'll wait.

**Point 138:** You accuse me of making false statements. All I've done is post your own emails—highlighting the inaccuracies in your complaint (case attached). Facts hurt.

Submitted under penalty of perjury,  
Al Rojas

P.S. I noticed you included my home address in the complaint. Was that really necessary?

<image001.png>  
From: Jared Bulger <[Jared.Bulger@mphasis.com](mailto:Jared.Bulger@mphasis.com)>  
Sent: Wednesday, December 18, 2024 2:19 PM  
To: Albert Rojas <[Albert.Rojas@qbe.com](mailto:Albert.Rojas@qbe.com)>; Balwinder Singh <[Balwinder.Singh@mphasis.com](mailto:Balwinder.Singh@mphasis.com)>; IND-EASE-L1 <[IND-EASE-L1@mphasis.com](mailto:IND-EASE-L1@mphasis.com)>; US-WPS-NY <[US-WPS-NY@mphasis.com](mailto:US-WPS-NY@mphasis.com)>; Shannon Mostafazadeh <[shannon.mostafazadeh@mphasis.com](mailto:shannon.mostafazadeh@mphasis.com)>  
Cc: Albert Rojas <[albert.rojas@mphasis.com](mailto:albert.rojas@mphasis.com)>; Jitendra Borkar <[Jitendra.Borkar@mphasis.com](mailto:Jitendra.Borkar@mphasis.com)>; Gururaj Murthy <[Gururaj.Murthy@mphasis.com](mailto:Gururaj.Murthy@mphasis.com)>; Dean Forrest <[Dean.Forrest@qbe.com](mailto:Dean.Forrest@qbe.com)>  
Subject: RE: [External] FW: Mphasis Laptop ## REQ0134355

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

You can use personal machines, but you will be limited to WEB Version only. This has been an Mphasis CIO/CRO policy for at least 5 years. **ONLY Mphasis Domain Joined machines can use Desktop apps, which allow downloading and storing of Mphasis data.**

**Upcoming Leave: 21-Dec-24 thru 29-Dec-24**

Regards,  
**Jared Bulger**  
**Senior U.S. Administration Officer**  
+1-332-255-9215 Office  
+1-669-258-6076 Mobile  
[Jared.Bulger@mphasis.com](mailto:Jared.Bulger@mphasis.com)  
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<image002.png>

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<QBE.pptx>