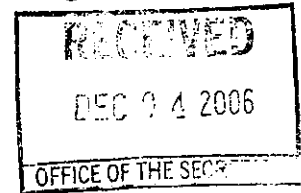


December 1, 2006

CONFIDENTIAL TREATMENT REQUESTED

Nancy M. Morris, Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-1090



**Re: Notice of Representation Pursuant to Rule 8(b)
17 C.F.R. 200.735-8(b)**

Dear Ms. Morris:

This statement is filed in compliance with the Commission's notice of representation requirement.

I was formerly Deputy Chief Counsel in the Division of Corporation Finance and resigned effective March 2006, to accept employment with the law firm of O'Melveny & Myers LLP. This is to advise you that I have been retained to represent (b)(4) in disclosure matters related to its Exchange Act reporting requirements. In the course of my representation of (b)(4) (b)(4) it is contemplated that I will appear before, or communicate with, the Commission or the staff of various offices of the Commission by telephone, correspondence, or otherwise.

While an employee of the Commission, to the best of my recollection, I did not have official responsibility for, nor did I participate personally or substantially in, any disclosure matters related to (b)(4)

Since my participation in this matter may continue for an indefinite period involving more than one communication with, or appearance before, the Commission or its staff, this statement is intended to cover all my appearances and communications that relate directly to (b)(4) in disclosure matters related to its Exchange Act reporting requirements.

In addition, I request confidential treatment for this letter because it refers to an ongoing nonpublic investigation.

Sincerely,



Robert Plesnarski

cc: