

Ray Beckerman

From: Thomas Mullaney [tmm@mullaw.org]
Sent: Friday, December 21, 2007 4:17 PM
To: Ray Beckerman
Cc: Morlan Ty Rogers
Subject: RE:

Ray,

Thanks for your courtesy.

I don't foresee any problems with confidentiality. The agreement SafeNet would need would be a standard Agreement, because the Defendant seeks a significant amount of documents that it would not release to the public at large for a variety of reasons, for example defendant seeks certain information concerning employees of SafeNet that is not in the public domain. Designations of confidentiality would be made in good-faith of course.

Enjoy the holiday, and thanks again.

Tom

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From: Ray Beckerman [mailto:rbeckerman@vanfeliu.com]
Sent: Thursday, December 20, 2007 1:30 PM
To: Thomas Mullaney
Cc: mtrogers@VANFELIU.com
Subject: RE:

Hi Tom

1. January 4th is fine.
- 2 What type of confidentiality problems do you foresee?
3. The only thing in our list that has been ruled upon is the retainer agreements, item 29. At the RIAA's request the judge ruled that I was not permitted to see them. However I would expect you to produce them to the Magistrate

in camera, in case (a) what you have isn't exactly what the RIAA had, or (b) he has changed his mind. (I've never understood how we could be precluded from seeing, for crossexamination purposes, the agreements under which MediaSentry is operating, which include compensation terms, the scope of the retention, etc.)

4. Nothing has been provided to us other than the printouts annexed as exhibits.

You have a great holiday too.

Best regards

Ray

Ray Beckerman
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From: Thomas Mullaney [mailto:tmm@mullaw.org]
Sent: Thursday, December 20, 2007 12:11 PM
To: Ray Beckerman
Subject: RE:

Ray,

Thanks for your courtesy in being agreeable to extending time to respond to the Lindor subpoena. I will serve responses and objections by January 4, 2008 to which you were amenable in our phone conversation the other day. I'm in the middle of an office move, and our date moved up a little. By the way, as of Dec 27 I'll be at 500 Fifth Ave, Suite 3020, NYNY 10110 for your records.

In the interim I thought it might be most productive if you could supply a confidentiality agreement/protective order for SafeNet to sign. I presume there is one in place with UMG but I have not seen it. Also, in checking the docket, it appears that there has already been a substantial production of SafeNet (MediaSentry) documents, which may make certain of the requests redundant, and that the Magistrate has ruled that certain of the requests are outside the scope of relevance in the litigation. If you could narrow the requests to cover documents not already provided and to be consistent with prior rulings, that would be appreciated. I'd rather not reinvent the wheel and reargue settled issues.

Again, thanks for your courtesy, and have a good holiday if we don't speak before.

Tom

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From: Ray Beckerman [mailto:rbeckerman@vanfeliu.com]
Sent: Thursday, December 06, 2007 9:15 AM
To: Thomas Mullaney
Subject:

<<subpoena document list final. wpd.wpd>> <<subpoena document list final. wpd.doc>>

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