

**EXHIBIT G**

**From:** Cenar, Kara  
**To:** George Hampton; gould@gouldlaw.com; Dickle, Dean A.; (rgreely@gouldlaw.com)  
**Cc:** Pink, Jonathan Stuart; Righettin, Justin; Seale, Merrill; Ed McPherson; "Linda Burrow"; "Barry Slotnick"  
**Subject:** Scheduling issues and meet and confer on order of discovery.  
**Date:** Thursday, March 31, 2011 4:57:18 PM

---

George, Ira and Dean,

I write in response to your letters of March 21, sent in both the Batts and Pringle matters, seeking to schedule depositions for individual members of The Black Eyed Peas, and representing a willingness to accommodate both counsels' and my clients' schedules.

The dates you have noticed for my clients' depositions, as well as depositions of others, will not work for my schedule as they conflict with a Jury trial I have scheduled.

The dates proposed also do not work for my clients' work and travel schedules.

Thus the dates you have selected will have to be rescheduled to a different time and different location. At least for my clients, please do not expect an appearance on the dates you have Noticed for their deposition in either case.

In an attempt to find available dates for deposition for everyone, I could not help but notice that you have scheduled each individual member of The Black Eyed Peas for two separate full days of deposition, one full day for each case. In some instances, for example Stacy Ferguson, you have her requested for one day and then are requesting that she return back two days later for another deposition. This is burdensome, oppressive and unnecessary in view of the limited issues involved in each case, and the limited knowledge each of these witnesses would have to those issues. Your proposed scheduling is making it very difficult to try to find time slots that work for everyone's schedule.

Given the very limited issues upon which the requested deponents would have knowledge with respect to your clients' copyright claims, I can't imagine each deposition taking more than one hour, two at the most, for the copyright issues in both cases combined.

That said, it would greatly help my attempts at rescheduling these depositions on dates and times convenient to all individuals and counsel (of which you know we have many in each case) if we could reach agreement on:

a) a realistic estimate of time for each deponent (i.e. can we expect 2 hours per person)

and/or

b) whether we can select a single day for a single deposition of a deponent on both cases,

and/or

c) whether we can schedule one day to take everyone's deposition (assuming 1-2 hr or so deposition per individual)

Please let me know the answers to the above requests. Once I have your answers, I will be in a better position to try to schedule the deponents for deposition.

Also, we anticipate filing a summary judgment on Batts on both access and inability to meet the extrinsic test, and a Motion for Summary Judgment possibly also in the Pringle case on issues such as

your client's sample claim. This is particularly likely given both Courts' rulings on the Preliminary Injunction Motion and your clients' admissions in their discovery responses.

We would like to try to limit attorneys fees and discovery expenses as much as possible with respect to each of the cases and are seeking your agreement to limit and to prioritize discovery at the forefront to only that which you believe is necessary for those limited liability issues.

The intent of my request is to try to meet and confer on this point and to try to limit unnecessary use of either of our clients' time, and to try to keep attorneys fees down as much as possible for all parties. As you know the Copyright Act permits my clients to an award of attorney fees should it prevail on these matters. I am mindful of the modest resources of your clients and am attempting to limit their potential exposure by reaching agreement with you on simple priority of discovery.

In that light, please let me know what individual depositions of any requested deponent you believe are necessary in the Batts case on the liability issues of access and the extrinsic test. I will focus my efforts to schedule those folks as early as possible. Please let me know what individual deponents you believe are necessary on the sampling claim of Mr. Pringle (which I don't believe could require the deposition of any of my clients but look to you for guidance) and I will endeavor to also try to prioritize my scheduling efforts on those individuals so that discovery on these issue can proceed promptly.

Of course if you are willing to stipulate to judgment on either of these cases based upon the issues determined in the preliminary injunction proceeding, thereby eliminating all further attorneys fees and costs, we would be willing to discuss that route as well.

I look forward to working with you on the aforementioned scheduling efforts and the meet and confer issues raised above. Thank you in advance for your cooperation.

Kara

**Kara E. F. Cenar | BRYAN CAVE LLP**

Partner - Chicago

161 North Clark Street, Suite 4300 | Chicago, IL 60601-3315

312.602.5019 direct | 312.698.7419 direct fax

773.818.5272 cell

[kara.cenar@bryancave.com](mailto:kara.cenar@bryancave.com)

[www.bryancave.com](http://www.bryancave.com)

---

This electronic message is from a law firm. It may contain confidential or privileged information. If you received this transmission in error, please reply to the sender to advise of the error and delete this transmission and any attachments.

IRS Circular 230 Disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing, or recommending to another party any transaction or matter addressed herein.

bcllp2010