

**Tal Dickstein**

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**From:** Dunn, Katharine N. <dunn@millercanfield.com>  
**Sent:** Thursday, July 07, 2011 10:28 AM  
**To:** 'Cenar, Kara'; Linda M. Burrow; Tal Dickstein; Barry Slotnick; Pink, Jonathan Stuart; Seale, Merili; Righettini, Justin; 'Ryan Greely'; Ira Gould; Dickie, Dean A.  
**Subject:** RE: Pringle matter EMI Supplemental Production

Kara,

In reading this email again, your position makes no sense. Regardless of whether or not we will agree to a stipulation to be entered with the Court, you are required to provide us with a copy of the EMI documents *immediately*. The parties are bound by a stipulated protective order that requires that we abide by the designations unless we move to challenge those designations with the Court. Accordingly, you are improperly withholding documents that should have been turned over weeks ago. We expect to have those documents hand-delivered to our office this morning. We will then review the documents and determine whether we will agree with your designations for purposes of a stipulation to be entered with the Court.

Katharine

Katharine Dunn



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**From:** Cenar, Kara [<mailto:Kara.Cenar@bryancave.com>]  
**Sent:** Wednesday, July 06, 2011 4:12 PM  
**To:** Dunn, Katharine N.; Linda M. Burrow; 'Tal Dickstein'; 'Barry Slotnick'; Pink, Jonathan Stuart; Seale, Merili; Righettini, Justin; 'Ryan Greely'; Ira Gould; Dickie, Dean A.  
**Subject:** Pringle matter EMI Supplemental Production

Katharine,

Defendant EMI in the Pringle matter has a supplemental production of Bate No. EMI.PR 00001-0000180 ready for your inspection. There are financial documents and things in the EMI production that are designated as Highly Confidential and for which we will need to seek entry of a protective order governing confidentiality. We are asking you to stipulate to the request for entry of the protective order governing confidentiality for these specific documents. We are asking you to please come to view the documents (they will be available for your review in our Chicago Office or we can make them available in our Irvine office) for the purposes of informing us whether you will stipulate to our request for protective order or whether you will oppose our request. If you stipulate, we will file the stipulation with the Court, with the specific identity of the documents as requested by the Court. Once entered the documents will be released to Plaintiffs' counsel. However they remain available in the interim period for your inspection and review at our office.

If you are willing to stipulate to entry of a protective order specific to the above referenced EMI documents, without review of the documents in advance, please send us any proposed revisions you may have to the draft stipulated protective order previously provided to you.

If you would like to review the documents before indicating whether you will stipulate or not to the requested protective order, kindly let me know of time tomorrow afternoon you would like to stop by for your review.

Please call with any questions you may have.

Kara

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

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