

EXHIBIT B

Jacqueline Spoons

From: William O'Brien
Sent: Tuesday, July 11, 2006 7:03 PM
To: Daralyn Durie
Subject: Netflix v. Blockbuster -- Discovery Requests
Attachments: Blockbuster's First Set of Requests for Production to Netflix.pdf; Blockbuster's First Set of Interrogatories to Netflix.pdf

Dear Daralyn,

We have served your firm today with a First Set of Interrogatories and a First Set of Requests for Production (PDF copies attached for your convenient reference).

I want to give you a heads-up at the outset that, while we are usually inclined to be liberal with extensions of time, these sets of discovery requests present a special case, because they are largely directed to facts implicated by Netflix's pending motion to dismiss. In that motion, as you know, Netflix attacks the facts alleged in support of certain Blockbuster defenses and counterclaims as insufficient and argues for the inadequacy of Blockbuster's allegations made on information and belief. While we believe that our allegations are both proper and adequate to support our claims and defenses, we need to be in a position to advise the Court at the hearing of what further allegations we can add if we are required to amend our pleading.

I hope you will understand. If there are any problems we will need to address with regard to the discovery requests, I would appreciate your contacting me as early as possible about them.

Best regards,

Bill

William J. O'Brien
Direct Dial: 310-255-9033
Direct Fax: 310-907-2033
wobrien@agsk.com