

EXHIBIT I

From: Klaus, Kelly [mailto:Kelly.Klaus@mto.com]
Sent: Friday, January 23, 2009 5:51 PM
To: DiBoise, Jamie; Bal, Colleen
Cc: ~REALDVD
Subject: Universal City Studios et al v Real Networks et al - Real's 30(b)(6) Notices of Deposition

Dear Jamie and Colleen:

I am writing in response to the 30(b)(6) deposition notices that you served on Plaintiffs Sony Pictures Entertainment Inc., Warner Bros. Entertainment Inc. and Disney Enterprises, Inc. We will be serving formal objections and responses to you on Monday, but in the meantime you should know that the three Studios have identified the following individuals they can make available for deposition regarding the general subject matter of the following topics, as indicated. Please note, however, that Real (like the Studios) is limited to deposing six individuals in total (in addition to those on the other side's designated witness list). Accordingly, you will have to let us know which specific six people you elect to depose (this assumes, of course, that Real does not propose to notice any other depositions that would take Real over the six individual limit):

Sony Pictures:

Aodan Coburn (Topics 2, 3, 4)

Mitch Singer (Topics 1, 6, 7)

Warner Bros.:

Bradley Collar (Topics 1, 2, 3, 4)

Christopher Odgers (Topics 2, 3, 4)

Mark Horak (Topic 6)

Thomas Gewecke (Topic 6)

Jim Wuthrich (Topic 7)

Disney:

Benn Carr (Topics 1, 6)

Lori MacPherson (Topic 7)

I hope to have an additional name or names to you on Monday of the person(s) from Disney regarding Topics 2-4

Please note that no Studio will be designating a witness to testify regarding your Topic 5 ("The effect of the CSS License Agreement on competition between [that Studio] and others in the electronic sell through market for digital content"). This is an incomprehensible topic.

Regarding Topics 8 and 9 in the notices: each of the aforementioned individuals can testify regarding their personal knowledge of the location and identity of documents and individuals

relevant to the subject matter on which that individual otherwise will be testifying. However, the Studios will not assume the burden of trying to amass their collective corporate knowledge concerning the location and identity of every individual and document that may relate to each topic. That task would be burdensome and infeasible, and is beyond the scope of anything that Real is entitled to obtain through a 30(b)(6) deposition.

Please let us know as soon as possible which of the foregoing individuals Real would like to include on its deposition list, and also let me know if you have any requested dates, and we will see if we can make these work. Please note that Mr. Coburn (Sony Pictures) is on business travel until February 9, but can be available for deposition on either February 10 or 11. All depositions will take place in Los Angeles, which is where the individuals reside and which is consistent with the parties' practices regarding the location of depositions in this case.

Best regards,
Kelly