

EXHIBIT A



"Roy A. Katriel, Esq."
<rak@katriellaw.com>

02/15/2006 02:14 PM

To "Tracy Strong" <tstrong@JonesDay.com>
cc rak@katriellaw.com, "Robert A Mittelstaedt"
<ramittelstaedt@jonesday.com>
bcc

Subject Re: Fw: Slattery v. Apple - documents to be produced

History: This message has been replied to and forwarded.

Tracy:

I am traveling back to DC tomorrow morning, and should have a response for you on this by close of business tomorrow. Thanks.

Roy A. Katriel, Esq.
THE KATRIEL LAW FIRM
1101 30th Street, NW Suite 500
Washington, DC 20007
Telephone: (202) 625-4342
Facsimile: (202) 625-6774

> Roy -
>
> On February 3, I sent you the message below requesting plaintiff to
> produce by Friday, February 10 the documents that he had not yet produced
> in response to our November discovery requests. We have not yet received
> anything. What is the status of your response?
>
> Tracy Strong
> JONES DAY
> 555 California St., 26th Floor
> San Francisco, CA 94104-1500
> Direct: (415) 875-5765
> Fax: (415) 875-5700
> tstrong@jonesday.com
> ----- Forwarded by Tracy Strong/JonesDay on 02/14/2006 04:32 PM -----
>
> Tracy Strong/JonesDay
> Extension 35765
> 02/03/2006 12:21 PM
>
> To
> rak@katriellaw.com
> cc
> Robert A Mittelstaedt/JonesDay@JonesDay
> Subject
> Slattery v. Apple - documents to be produced
>
>
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>
> Roy -
>
> This follows up with our discussions at the deposition regarding
> outstanding items in response to our document requests to plaintiff: We
> would like to receive these documents in one week (by February 10, 2006):
>
> 1. All credit card invoices/statements showing Mr. Slattery's purchases

> from iTunes and any other online music stores (included but not limited to
> Sony) and any other music purchases made from brick and mortar stores
> (included but not limited to Music Trader, Tower, Sam Goody) or any other
> music vendor. (See RFP Nos. 1-4). Also all credit card
> invoices/statements showing Mr. Slattery's purchase of his other portable
> hard drive music players. (See RFP No. 10).

>
> 2. A printout of Mr. Slattery's account information page from iTunes,
> showing his Apple ID, credit card, billing address, most recent purchase
> date, etc. (See RFP Nos. 5 and 23)

>
> 3. Printouts or electronic versions of all of Mr. Slattery's music
> libraries from all of his computers. You were unclear as to whether the
> iTunes (and any other) libraries had been produced from the Mac Mini as
> well as the HP and were going to provide any libraries that had not been
> produced. Any libraries on Mr. Slattery's work computer should also be
> provided, as requested. Also, Mr. Slattery discussed his Creative Media
> Source library and his Sony library, which have not, but should have, been
> produced. (See RFP Nos. 22, 1, 2 and 14).

>
> 4. Mr. Slattery's CD collection or list of all CDs. (See RFP No. 27) Mr.
> Slattery noted at the deposition that it would be burdensome to catalogue
> all of his CDs but that it would be possible. If he cannot do this in the
> time provided, please have him turn over the CDs for our inspection and
> cataloguing, after which the CDs will be returned to him.

>
> 5. Mr. Slattery's home computers: the HP and Mac Mini. (See RFP No. 26)
> Please provide us with a date on which Guidance Software can image these
> hard drives. Technically, your privilege objection is waived by your late
> responses and document production more than 2 months after being served
> with the document requests. However, we are willing to work out an
> arrangement with you and our computer technicians to protect any
> privileged documents from disclosure. There are a variety of ways to do
> this that we would be happy to discuss with you.

>
> Finally, we still have not received your initial disclosures of witnesses
> that were due on January 5. Please also provide those by February 10. As
> for initial disclosures of documents, we are willing to treat the document
> request responses made by both parties as sufficient to meet both parties'
> disclosure obligations. Is that agreeable?

>
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