Doc. 117 Att. 6

## EXHIBIT F

From:

Helen Trotta [HTrotta@mdpcelaw.com]

Sent:

Monday, June 07, 2010 2:17 PM

To:

Ott, Carter

Cc:

Jeffrey Carton

Subject:

Ventura v. SCEA

Attachments: 20100607170333449.pdf

Dear Mr. Ott:

Please see attached letter from Jeff Carton. Thank you.

Helen Trotta Legal Assistant Meiselman, Denlea, Packman, Carton & Eberz P.C. 1311 Матагопеск Ачепие White Plains, New York 10605 Tel: (914) 517.5075 htrotta@mdpcelaw.com

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## Meiselman, Denlea, Packman, Carton & Eberz P.C.

Attorneys at Law

I3II MAMARONECK AVENUE WHITE PLAINS, NY 10605 TEL: (914) 517-5000 FAX: (914) 517-5055 jcarton@mdpcelaw.com JEFFREY I. CARTON
MEMBER OF THE FIRM

June 7, 2010

## VIA EMAIL

Carter W. Ott, Esq.
DLA Piper LLP
555 Mission Street
Suite 2400
San Francisco, California 94105-2933

Dear Carter:

This letter responds to your emails of Sunday evening (6/6/10) at 6:17 p.m. and to that of today at 2:22 p.m. Your continued reference to a "false posting on [my] firm's website" misleadingly suggests that my firm somehow played a role in this false posting, a fact which should be obvious to you is untrue. As I explained when we spoke yesterday, my firm had no part whatsoever in the posting. As you can readily deduce, the website was hacked and an unauthorized post was made. In that regard, I take serious exception to your decision yesterday to copy every lawyer at my firm on your email. You could only have done so for the purposes of trying to embarrass us, as the vast majority of the lawyers to whom you copied your email have never been associated with the pending litigation and do not appear anywhere on the pleading. Rest assured that if this is how you intend to comport yourself going forward, we will have little choice but to copy every attorney at DLA Piper on our future exchanges.

With respect to your requests of today's date, you are in no position to inquire as to the information we are collecting regarding the posting. As an initial matter, any inquiries our firm may have received regarding the posting would certainly fall within the ambit of the attorney-client privilege and/or of our work product, if not also constitute an impermissible invasion of consumers' privacy. While we have every interest in identifying the perpetrator of this act (and are employing third parties at considerable expense to do so), we have no intention of sharing any additional information with you at this time. Indeed, a criminal indictment for criminal impersonation may well be in the offing and you and your Firm have no place in that dialogue.

Finally, with respect to your feigned misunderstanding as to why we might believe Sony could be responsible for this posting, I can remark only that Sony's interest in attempting to discredit the very law firm which first filed an action against it regarding the disabling of the OS feature (litigation which has now taken on an

## Meiselman, Denlea, Packman, Carton & Eberz P.C.

Carter W. Ott, Esq. DLA Piper LLP June 7, 2010

international interest), would not be beyond the realm of possibility. While I certainly hope that is not the case, it would be imprudent to rule out any such possibilities at this time.

I trust that you will now constrain yourself to litigating the issues in the action.

Very truly yours,

MEISELMAN, DENLEA, PACKMAN, CARTON & EBERZ P.C.

leffrey//cartor

JIC/ht 00230879,WPD