

EXHIBIT A

From: Rebecca Coll [rcoll@calvofisher.com]
Sent: Tuesday, January 25, 2011 10:01 AM
To: Ott, Carter; Rebecca Coll; James Quadra
Cc: James Pizzirusso (jpizzirusso@hausfeldllp.com); Rosemary M. Rivas; Daniel L. Warshaw (dwarshaw@pswplaw.com); Sacks, Luanne
Subject: RE: Sony Other OS

Carter

Following up on your proposal below, we agree to exchange indices for all documents produced to date, and all documents produced in the future. We suggest that the parties exchange indices of documents produced to date on February 1. Please let us know if that date works for your side. Also, pursuant to Magistrate Judge Chen's Standing Order, please be advised that all materials we agreed to produce that were locatable after diligent searches of all locations at which such materials might plausibly exist have been produced.

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From: Ott, Carter [mailto:Carter.Ott@dlapiper.com]
Sent: Thursday, December 23, 2010 9:54 AM
To: Rebecca Coll; James Quadra
Cc: James Pizzirusso (jpizzirusso@hausfeldllp.com); Rosemary M. Rivas; Daniel L. Warshaw (dwarshaw@pswplaw.com); Sacks, Luanne
Subject: RE: Sony Other OS

Rebecca,
To clarify, we intend this index to serve as an alternative to the parties' obligation related to document production under FRCP 34, and we also intend that we would also provide an index. Please let me know if you have a better idea.

To follow up, we have not heard from you with regard to our revisions to the stipulation regarding consolidation. Will you be able to let us know whether you agree to our revisions before the end of the day?



Carter W. Ott
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From: Rebecca Coll [mailto:rcoll@calvoclarck.com]
Sent: Wednesday, December 22, 2010 9:24 AM
To: Ott, Carter; James Quadra
Cc: James Pizzirusso (jpizzirusso@hausfeldllp.com); Rosemary M. Rivas; Daniel L. Warshaw (dwarshaw@pswplaw.com); Sacks, Luanne
Subject: RE: Sony Other OS

Carter:

Your email is not responsive to mine. Is it your position that Plaintiffs should provide an index of documents produced, but SCEA should not?

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From: Ott, Carter [mailto:Carter.Ott@dlapiper.com]
Sent: Tuesday, December 21, 2010 9:47 PM
To: Rebecca Coll; James Quadra
Cc: James Pizzirusso (jpizzirusso@hausfeldllp.com); Rosemary M. Rivas; Daniel L. Warshaw (dwarshaw@pswplaw.com); Sacks, Luanne
Subject: RE: Sony Other OS

Rebecca,
We would appreciate if you would provide us with an index describing the categories of documents listed per bates range.

Thank you,
Carter



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From: Rebecca Coll [mailto:rcoll@calvoclarck.com]
Sent: Wednesday, December 15, 2010 4:00 AM
To: Ott, Carter; James Quadra
Cc: James Pizzirusso (jpizzirusso@hausfeldllp.com); Rosemary M. Rivas; Daniel L. Warshaw (dwarshaw@pswplaw.com); Sacks, Luanne
Subject: RE: Sony Other OS

Carter-

Our document production is close to complete. We will finish the production as soon as possible. Regarding the index, we will agree that the parties (both sides) should index their document productions. Please let us know what information you propose the parties should include in the indices .

Thanks.

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From: Ott, Carter [mailto:Carter.Ott@dlapiper.com]
Sent: Thursday, December 09, 2010 4:14 PM
To: James Quadra
Cc: James Pizzirusso (jpizzirusso@hausfeldllp.com); Rosemary M. Rivas; Rebecca Coll; Daniel L. Warshaw (dwarshaw@pswplaw.com); Sacks, Luanne
Subject: RE: Sony Other OS

James,
Unfortunately, we cannot agree to many of your proposed additions to the SCEI stipulation, in particular, your proposal that SCEI's actions are imputed to SCEA. As I understand from Jim's email, this will not hold up our stipulation regarding briefing and hearing our discovery motions. Please confirm your agreement to the stipulation and proposed order I sent you Monday morning, provided I change the deadline for filing the motions from December 10 to December 15.

We recently received an additional production from your office apparently containing Baker, Stovell, and Ventura documents. Please confirm that your document production is now complete. Also, please let us know if you intend to provide us with an index of the documents you have produced, per our prior request.

Finally, we have previously asked that you provide us with your clients' addresses and telephone numbers to assist us with finding records related to them. Please let us know if you are willing to

provide us with this information.

Thank you,
Carter



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From: James Quadra [mailto:jquadra@calvoclarck.com]
Sent: Wednesday, December 08, 2010 4:00 PM
To: Ott, Carter
Cc: James Pizzirusso (jpizzirusso@hausfeldllp.com); Rosemary M. Rivas; Rebecca Coll; Daniel L. Warshaw (dwarshaw@pswplaw.com)
Subject: Sony Other OS

Carter:

The proposal that we would waive all potential claims against SCEI is not something we discussed previously. Obviously, we are only prepared to do so if SCEA agrees that it is the proper party at interest and any statements, actions, etc. that may have created liability are imputed to SCEA and that SCEA will not raise as a defense that "it wasn't us - it was SCEI."

We do not think that SCEI/SCEA were attempting to foreclose potential liability here or somehow use this against us, but we need to make sure that any stipulation clearly addresses this. Otherwise, we are prepared to brief and argue this in front of Chen. We have proposed language in the stipulation that will address this issue.

Further, your stipulation seems to limit discovery solely to the first set of document requests. We cannot agree to limit the SCEI discovery solely to that set - particularly if, as discovery progresses, we find additional areas of relevant discovery to pursue. We have proposed language addressing that issue, as well.

Given the schedule you are proposing, we need to know your position on this by tomorrow at 5 pm PT.

Regards

1/26/2011

Jim

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