

# EXHIBIT 7

## Gaudreau, Holly

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**From:** Gaudreau, Holly  
**Sent:** Monday, March 14, 2011 1:58 PM  
**To:** 'Stewart Kellar'; 'Jack C. Praetzellis'  
**Cc:** Boroumand Smith, Mehrnaz  
**Subject:** RE: Scheduling a time to M&C re: Proposed Order

Dear Stewart and Jack,

We've reviewed your letter. We do not believe there is a need to seek a two day extension from the Court in submitting a proposed order as it is clear from the parties' multiple exchanges of correspondence that we are at an impasse.

SCEA's proposed order accurately reflects the Court's orders during the March 10, 2011 hearing. It also allows for the additional meet and confer -- on the impoundment protocol for the search for information related to the circumvention and the protocol for the search for jurisdictional discovery -- as ordered by the Court. Involving TIG in such a meet and confer is necessary to ensure that these tasks will be properly implemented. It is clear that you disagree. Consequently, we plan on submitting our proposed order to the Court with a joint letter explaining that the parties could not agree on the substance or the form of the order. Please provide us your inserts to the letter and your proposed order by 4:00 p.m. today. This will provide the Court with an understanding of our disagreement. Judge Spero can then issue his order based on his rulings at the hearing.

Thanks.  
Holly

**Holly Gaudreau**  
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**From:** Stewart Kellar [<mailto:stewart@etrny.com>]  
**Sent:** Monday, March 14, 2011 12:48 PM  
**To:** Boroumand Smith, Mehrnaz  
**Cc:** Gaudreau, Holly; Jack C. Praetzellis  
**Subject:** Re: Scheduling a time to M&C re: Proposed Order

Hello Holly and Mehrnaz,

Please find the attached letter re: the proposed order, thank you.

Stewart Kellar  
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3/14/2011

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On Fri, Mar 11, 2011 at 12:45 PM, Boroumand Smith, Mehrnaz

<[mboroumand@kilpatricktownsend.com](mailto:mboroumand@kilpatricktownsend.com)> wrote:

Stewart -- Attached is a draft of the proposed order. I did not include the language about the third party subpoenas issued pursuant to Judge Spero's March 3, 2011 order because he issued his own order about that yesterday. Also, you will see that there is one section that is highlighted and in brackets regarding how we address the "information related to the circumvention of the TPMs in the PS3 System." That language was not ordered by the Court yesterday, although the court did indicate that TIG would be best suited for determining how to address this issue. To that end, we would propose that the parties work with TIG to come up with a protocol to be submitted by the middle of next week. The draft reflects that proposal.

Please provide your edits/comments in redline format.

Thanks,

Mehrnaz

**Mehrnaz Boroumand Smith**

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**From:** Boroumand Smith, Mehrnaz

**Sent:** Thursday, March 10, 2011 7:01 PM

**To:** Stewart Kellar

**Cc:** Boroumand Smith, Mehrnaz; Gaudreau, Holly; Jack C. Praetzellis

**Subject:** Re: Scheduling a time to M&C re: Proposed Order

Hi Stewart,

I made some progress on the draft after our call this afternoon and should be able to get the it to you by noon tomorrow or so thereafter.

Mehrnaz

Sent from my iPhone

On Mar 10, 2011, at 6:18 PM, "Stewart Kellar" <[stewart@etrny.com](mailto:stewart@etrny.com)> wrote:

Hello Mehrnaz and Holly,

Further to our conversation this afternoon. We would like to have a draft of Judge

Spero's Order to review by noon tomorrow, Friday March 11, 2011. We will then have our edits in to you tomorrow as well. Then we can do further relays of proposed changes over the weekend and have a final version ready well before close of business on Monday. Thank you.

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On Thu, Mar 10, 2011 at 3:10 PM, Stewart Kellar <[stewart@etrny.com](mailto:stewart@etrny.com)> wrote:  
Hello Jim, Mehrnaz, and Holly,

I am writing to follow up on a message I left for each of you seeking to schedule a time to meet and confer regarding Judge Spero's Order. We want to meet tomorrow to discuss the terms of that Order. We have scheduled a conference room at MBV Law for 11am tomorrow, March 11, 2011. Please confirm you can make that time. We look forward to discussing the Order at that time.

Sincerely,

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