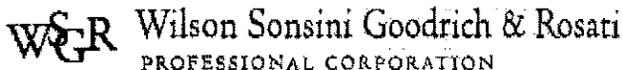


EXHIBIT B



Date: August 23, 2004

To: P. Craig Cardon

Fax: (415) 434-3947

Use this fax number only

Company: Sheppard, Mullin, Richter & Hampton

Phone: (415) 434-9100

Notify recipient before sending

From: Stephen Holmes

Phone: (650) 493-9300 X 3256 Return Fax: (650) 565-5100

Original: To follow via mail To follow via courier To follow via email Original will not follow

Fax Contains: 2 pages (including this sheet). If incomplete, call Purita @ (650) 461-5220

Message: Please see attached letter

Ref: 21622.514

Return Original to: Purita Marquez

Location: BA 1-1

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PROFESSIONAL CORPORATION

650 Page Mill Road
Palo Alto, CA 94304-1050
PHONE 650.493.9300
FAX 650.493.6811
www.wsgr.com

August 23, 2004

Via Facsimile and U.S. Mail

P. Craig Cardon
Sheppard, Mullin, Richter & Hampton LLP
Four Embarcadero Center, 17th Floor
San Francisco, CA 94111-4106
Fax No.: (415) 434-3947

Re: Digital Envoy, Inc. v. Google Inc.
Case No.: C 04-01497 RS

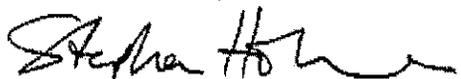
Dear Craig:

Further to your email of last Friday and our conversation today, it is Google's position that 2019(d) of the California Code of Civil Procedure applies in federal court, and specifically to the present proceedings in the Northern District of California. See *Computer Economics, Inc., vs. Gartner Group, Inc.*, 50 F. Supp.2d 980 (SD CA, 1999).

It seems reasonable to us that a plaintiff in a trade secret case must identify its alleged trade secrets before it commences discovery, which is what 2019(d) clearly requires. We would like for this not to be an issue, which is why I called the matter to your attention. Please therefore identify Digital Envoy's trade secrets with reasonable particularity as soon as possible.

Very truly yours,

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation



Stephen C. Holmes

cc. Timothy H. Kratz, McGuireWoods LLP