

EXHIBIT B

Paula Roach

From: David Kiernan [dkiernan@JonesDay.com]
Sent: Monday, August 03, 2009 10:00 AM
To: Paula Roach
Cc: Tom Merrick
Subject: Re: AIIA 30b6 production

Agreed.

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08/03/2009 09:10 AM

Subject AIIA 30b6 production

David:

As a follow up to our call on 7/31, I want to confirm that certain documents are included in the documents to be produced. During our call we agreed that Apple would be producing documents concerning: (1) software updates that address conduct by competitors to permit direct playback of iTunes files on a non-iPod and/or permit direct playback of non-iTunes files on an iPod; and (2) software updates that addressed "hacks". Plaintiffs reserved their right to seek compliance with additional requests after production of the above categories begins.

We had previously discussed production in response to Request 7. Through this request plaintiffs seek all communications between Apple and the record labels concerning "hacks". Please confirm that to the extent responsive documents exist they will be produced in the above production.

We look forward to receiving a proposed custodian list and search terms from you by the end of this week or early next week.

thanks

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11/17/2009

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