

EXHIBIT N

Campos, Mario

From: Ellinikos, Maria
Sent: Friday, May 09, 2008 5:21 PM
To: 'Baum, Brandon'; Masur, Joshua M.
Cc: Hemminger, Steve; Campos, Mario
Subject: Viacom et al. v. YouTube et al.

Attachments: scan.pdf



scan.pdf (57 KB)

Please see attached correspondence.

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May 9, 2008

Brandon Baum, Esq.
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Two Palo Alto Square, Suite 300
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Palo Alto, California 94306-2112

Re: *Viacom International, Inc. v. YouTube, Inc.*, No. 1:07-cv-2103 (S.D.N.Y.) and
Premier League v. YouTube, No. 1:07-cv-3582

Dear Brandon:

I write in response to your letter dated May 8, 2008.

First, BayTSP agreed to produce information stored on its proprietary databases that is responsive to YouTube's subpoena; BayTSP did not agree to produce copies of its proprietary databases. The native file formats in which BayTSP will produce the responsive information it extracts from its proprietary databases will be accessible using standard applications such as Microsoft Excel, Mozilla Firefox and Notepad.

Second, the reason that we have asked you to provide search terms is because you are the ones requesting the information from BayTSP. Just as it is incumbent on YouTube to include specific document requests that identify the subject matter of the documents YouTube believes are relevant to its dispute with Viacom and wants produced by BayTSP, to ensure that the documents retrieved electronically are documents that you believe are relevant to YouTube's dispute with Viacom, you should be able to identify search terms that capture what you believe is the relevant subject matter. In any event, with your agreement that providing you with our current list of search terms will not constitute a waiver of any privilege and/or work product claims, we will be willing to give you a list of search terms we plan to use. In addition, given the volume of information to be filtered and the associated cost for processing this information, we do not see this as an iterative process.

With regard to your other requests, we are in the process of obtaining information to respond to your requests and will be better able to discuss them early next week. You should

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also be aware that given the volume of information requested we believe that the cost for providing the documents in the formats you have requested could be in the range of six figures.

Sincerely,

/s/ Maria Ellinikos

Maria Ellinikos