

# Exhibit B

**Fee, J. Kevin**

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**From:** Kathleen Lu [klu@fenwick.com]  
**Sent:** Tuesday, December 16, 2014 4:00 PM  
**To:** 'Rehn, Thane'; 'jwetzal@kslaw.com'; 'ksteinthal@kslaw.com'; 'Zee, Andrew'; 'jbucholtz@kslaw.com'; Fee, J. Kevin; Clayton, Michael F.; 'Blavin, Jonathan'; Rubel, Jordana S.; Childs, Edwin O.; 'Klaus, Kelly'  
**Cc:** Andrew Bridges; 'mitch@eff.org'; 'Corynne McSherry'; 'davidhalperindc@gmail.com'  
**Subject:** ASTM v PRO - deposition dates

Counsel,

We need to determine deposition dates for the first two weeks of January and we would prefer to accommodate the witnesses' schedules rather than issuing subpoenas for our available dates.

PRO will take a deposition each day on Jan 5, 6, 7, 8, and 9 in D.C. Please advise which of Plaintiffs' witnesses you will make available those days and which 30(b)(6) topics each witness is the designee for.

Also please confirm that you will accept subpoenas on behalf of the following party-affiliated witnesses and please give available dates for deposition for them if they are not available Jan 5-9 in D.C.: Jim Shannon, Jim Pauley, Jeff Grove, Stephanie Reinieche.

Mr. Malamud is available for deposition on Jan 2-3, or on Jan 12.

Please let us know by close of business tomorrow on these dates.

Thank you,  
Kathleen Lu  
Fenwick & West LLP  
+1 (415) 875-2434

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