

EXHIBIT 2

From: Thompson, Rod (27) x4445
Sent: Monday, December 05, 2011 1:21 PM
To: 'Fabrizio, Steven B'; 'DPozza@jenner.com'; 'Platzer, Luke C'
Cc: Schoenberg, Tony (28) x4963; Leibnitz, Andrew (21) x4932; Engstrom, Evan (27) x4945; 'gurvits@bostonlawgroup.com'; 'Janet Munn'
Subject: RE: document clawback

Steve, as I advised you today during the deposition, in early March, at the request of its attorneys, Hotfile began its protected work product investigation in to Warner's wrongful takedowns via the SRA tool. The date the work product investigation began was March 2nd, 2011. As you are aware many of the documents were written in Bulgarian and as a result our privilege review is taking a long time.

We therefore we ask that you refrain from marking as exhibits at any of the depositions this week (or otherwise make use of) documents created by Hotfile on or after that date that are appear to potentially be work product. If there is a question on the issue, please show me the document before using. In particular, do not use any of the documents listed below in Tony's email and return all copies to us. I'm copying Luke and Duane to be sure there is no misunderstanding.

So far you've marked two documents that are work product of Hotfile: (HF2303232) Exh. 26, that was expressly clawed back in Tony's email to Duane below, and HF 02866338-369 Exh. 27, which we hereby ask that you return to us and destroy all copies pursuant to paragraph 20. As I stated on the record today, we also object to all questions and responses based on this two documents and ask your assistance in getting them stricken from the record before a final transcript is prepared. Thank you for your cooperation.

Rod

From: TSchoenberg@fbm.com [<mailto:TSchoenberg@fbm.com>]
Sent: Saturday, December 03, 2011 9:55 AM
To: DPozza@jenner.com
Subject: document clawback

Duane-

We hereby request the destruction of the following documents pursuant to paragraph 20 of the protective order: HF02835266, HF02863431, HF02865156, HF02835194, HF02863433, HF02863224, HF02863225, HF02831644, HF02831511, HF02831512, HF02831538, HF02831598, HF02703712, HF02703713, HF02703739, HF02703799, HF02703800, HF02703826, HF02703886, HF02831644, HF02158854, HF02158855, HF02303232, HF02303233, HF02304874, HF02304875, HF02305054, HF02305055, HF02703712, HF00035990, HF00035991, HF00036777, HF00036778, HF02158745, HF02863226, HF02863227 and HF02863228. These were inadvertently produced. Each of the documents is protected by the attorney-client privilege and/or constitute protected work product. Please confirm that you have destroyed all copies of these documents.

Regards,

Tony

Anthony P. Schoenberg
Attorney at Law

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Farella Braun + Martel LLP