

EXHIBIT B

KING & SPALDING

King & Spalding LLP
1180 Peachtree Street, NE
Atlanta, Georgia 30309-3521
www.kslaw.com

Kristen A. Swift
Direct Dial: 404 572-4762
Direct Fax: 404 572-5134
kswift@kslaw.com

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VIA ELECTRONIC MAIL AND U.S. MAIL

Edward B. Krugman, Esq.
Bondurant, Mixson & Elmore, LLP
1201 West Peachtree Street NW
Suite 3900
Atlanta, Georgia 30309
krugman@bmelaw.com

**RE: *Cambridge University Press, et al. v. Patton, et al.*,
United States District Court for the Northern District of Georgia
Case No. 1:08-CV-1425-ODE**

Dear Edward:

We are in receipt of your letter of today regarding the depositions of William Potter and Nancy Seamans, the production of documents pertaining to the new policy, and the postponement of the depositions of Denise Dimsdale, Cory Schlotzhauer, Jim Palmour and Laura Burtle. This response letter is to provide you with the dates of availability for William Potter's and Nancy Seamans' depositions and to confirm our conversations on February 23, 2009, regarding the University System of Georgia's new copyright policy.

Regarding the depositions of William Potter and Nancy Seamans, Mr. Potter is available at 10:00 a.m. on March 9, 2009, at our offices, and Ms. Seamans is available at 10:00 a.m. on March 10, 2009, at Georgia State University. Please let us know at your convenience whether these dates are acceptable.

Regarding documents pertaining to the new policy, we are currently working to collect and review all such documents and will endeavor to produce any non-privileged documents responsive to Plaintiffs' First Requests for the Production of Documents Nos. 2, 3, 6, 31, 32-36, and 39, before the above-referenced depositions take place. Please note that we plan to assert the attorney-client privilege as to documents and discussions at copyright committee meetings because counsel were present for the purpose of providing legal advice and did provide legal advice. We also intend to assert the attorney-client privilege as to email communications made by committee members to secure legal advice on which counsel were copied. Any responsive

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documents which are withheld due to privilege will be included on a privilege log for your review.

In our letter of February 20, we suggested that, in light of the recent adoption of the new policy on the use of copyrighted works by the University System of Georgia, the parties discuss their conduct going forward in this case. You agreed to confer with us on Monday, February 23. We proposed in our February 23 conversation that the parties postpone the depositions scheduled for the following week to give the parties time to engage in discussions about the new policy. Because you have made clear that the only relief your clients seek in this lawsuit is satisfactory copyright guidelines, we thought an open discussion about the adequacy of the new policy would be an effective attempt at resolving this matter.

While you have agreed to postpone the depositions, it is our understanding that you wish to move forward with this litigation rather than discuss the new policy. We also understand that you believe the new policy is, on its face, wholly inadequate to ensure compliance with copyright law, and that our clients should have invited you to participate in the meetings of the copyright committee as appointed by the Board of Regents to update the new policy.

We appreciate your proposal to postpone the above-mentioned depositions, and look forward to hearing from you regarding our proposed dates for the depositions of William Potter and Nancy Seamans. However, as discussed, we continue to welcome the opportunity to discuss the new policy with you. In an effort to resolve this matter, our clients will be glad to consider any specific feedback your clients can provide about the new policy.

Sincerely,



Kristen A. Swift

cc: John H. Raines, IV, Esq. (via email)
R. Bruce Rich, Esq. (via email)
Randi W. Singer, Esq. (via email)
Todd Larson, Esq. (via email)
Cynthia V. Hall, Esq. (via email)
Burns Newsome, Esq. (via email)
Mary Jo Volkert, Esq. (via email)
Anthony B. Askew, Esq. (via email)
Stephen M. Schaetzel, Esq. (via email)
Glenda R. Smith (file)