

EXHIBIT B

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May 28, 2009

VIA FACSIMILE

Robert Foote, Esq.
Foote Meyers Meilke & Flowers LLC
28 North First Street, Suite 2
Geneva, Illinois 60134

Re: Vulcan Golf, LLC v. Sedo.com LLC, et al

Dear Bob:

We are writing in response to your May 27, 2009, letter to all defense counsel regarding the pending motion to limit discovery and for a scheduling order.

While there appears to be significant common ground between the plaintiffs' and defendants' proposals (*e.g.*, limiting discovery to that which is related to the anticipated summary judgment motions), the crucial difference is that defendants propose to file their summary motions first, before plaintiff propounds discovery, in order to delineate the limits of relevant discovery.

Otherwise, the plaintiffs and defendants are unlikely to have the same notion of the meaning and scope of "ACPA discovery" (the phrase used in your letter), thereby causing avoidable discovery disputes. We do not think that "ACPA-related" discovery should include anything and everything having to do with any element of the statute, but instead should be limited only to those elements challenged in the defendants' respective SJ motions. Then plaintiffs can frame relevant discovery similar to what happens under Federal Rule of Civil Procedure 56(f). If you have thoughts as to how best to frame these narrow issues besides having the defendants file their motions first, we should discuss them.

Robert Foote, Esq.
May 28, 2009
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Please let me know if you would like to discuss the above. In the event you choose instead simply to oppose the pending motion, I ask that you provide the court with a copy of this letter.

Sincerely,

A handwritten signature in black ink that reads "Steve Atlee". The signature is written in a cursive, slightly slanted style.

Steven D. Atlee
Counsel for Overseer.net

SDA:law

cc: (by e-mail only):

Kathleen Chavez
Matt Herman
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