

# **EXHIBIT B**

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June 28, 2011

**VIA E-MAIL**

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Dear Susan and Audrey:

We sent a letter more than a week ago proposing that the parties begin producing documents now with the understanding that they will be treated under the terms of Google's proposed protective order until a final protective order is entered by the Court. You have not responded, and the Court still has not entered a protective order. We assume your lack of a response is a no. Pursuant to Local Rule 37.1, we would like to schedule a discovery conference this week before bringing a motion to compel on this issue. Please let me know your availability.

Sincerely,

/s/ Lina F. Somait

Lina F. Somait