

EXHIBIT B



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August 11, 2011

John A. Shope
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BY EMAIL AND FIRST CLASS MAIL

Gregory A. Madera, Esquire
Fish & Richardson
1 Marina Park Drive
Boston, MA 02210

Re: *Jayme Gordon v. DreamWorks Animation SKG, Inc., et al.*,
Civil No. 1:11-cv-10255-JLT (D. Mass.)

Dear Greg:

The dates on which plaintiff Jayme Gordon purportedly created and disclosed his works are material issues in this case. Because, among other reasons, Mr. Gordon has already admitted to the Copyright Office that he has incorrectly reported the dates ascribed to the creation of his work, we believe that a forensic examination of Mr. Gordon's electronic media is in order.

Accordingly, in connection with the parties' automatic disclosures, we request that Mr. Gordon make accessible for forensic imaging (to be conducted by a third party at the defendants' expense) all electronic media (including, without limitation, any CDs, thumb drive, external drives, replaced or individual hard drives, or flash drives) containing information subject to disclosure.

In addition, we request that Mr. Gordon refrain from deleting or altering any material relating to the allegedly infringing or infringed works.

We anticipate that the imaging process would deprive Mr. Gordon of his devices by no more than 48 hours, and therefore should create little or no burden. Our third-party vendor could make images of the materials at Mr. Gordon's house or at your offices as you prefer.

To the extent that Mr. Gordon's devices contain privileged communication with his attorneys, we are open to reasonable proposals regarding sequestration of the same.

Gregory A. Madera, Esq.
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Please confirm by this coming Monday, August 15, 2011, that Mr. Gordon will provide the access for imaging requested, so that if we do not have agreement we may present the issue to Judge Tauro at the initial status conference on Wednesday, August 17, 2011.

Thank you for your attention to this matter.

Sincerely,



John A. Shope

JAS:jfa

cc: Julia Huston, Esquire (by email)
David A. Kluft, Esquire (by email)
Jonathan Zavin, Esquire (by email)
David Grossman, Esquire (by email)