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August 30, 2011

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Re: *Jayme Gordon v. DreamWorks Animation SKG, Inc., et al.*,
USDC, D. Mass. C.A. No. 1:11-cv-10255-JLT

Dear John,

This letter responds to your letter dated August 18, 2011.

First, Mr. Gordon maintains three active e-mail accounts, namely info@jaymegordon.com, lucky lizard@aol.com, and payontime@hotmail.com. We have reviewed these accounts and confirm that there are no e-mails in these accounts that are relevant to this litigation with the exception of privileged communications between Mr. Gordon and his counsel. We expect that the parties will agree on a time to exchange privilege logs during the course of this litigation.

Second, you asked specifically about any documents regarding Mr. Gordon's knowledge of the "Kung Fu Panda" film before its release and whether any electronic records evidencing such knowledge might exist. After further investigation, we can confirm that all documents relating to Mr. Gordon's knowledge of the "Kung Fu Panda" film have been produced and that Mr. Gordon does not have any additional documentation relevant to this inquiry, electronic or otherwise. It is our present understanding that Mr. Gordon viewed a trailer for the "Kung Fu Panda" film before filing his 2008 copyright registration. Mr. Gordon used a computer in 2008 to prepare his 2008 copyright filing. That computer later stopped functioning and was discarded. To the best of his recollection, Mr. Gordon did not save these files.

Very truly yours,

s/Kristen McCallion

cc:

Julia Huston, Esq. (by email)
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