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VIA ELECTRONIC MAIL

October 6, 2011

David Grossman, Esq.
Loeb & Loeb LLP
10100 Santa Monica Blvd.
Suite 2200
Los Angeles, CA 90067

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

Dear David:

This letter responds to your letter dated September 29, 2011.

As we previously advised you in our letter dated September 1, 2011, responsive documents in the possession of Mr. Partello were produced in accordance with the Court's automatic disclosure requirement. For example, copies of relevant drawings were produced, Mr. Partello's signed statement was produced, the assignment agreement was produced, and an agreement that was superseded by the aforementioned assignment agreement was later produced. Further, Mr. Kluff inspected the original drawings of the deposit copies submitted in connection with Mr. Gordon's copyright registration that identifies Mr. Partello. Based on our present knowledge, it is our understanding that there are no relevant documents in the possession of either Mr. Partello or Ms. Gordon that have not already been produced. However, we will again ask Mr. Partello and Ms. Gordon to confirm that they have searched all relevant files, including electronic files, and that all relevant documents within their possession have been produced. To the extent any such documents exist, we will produce them.

Regarding JG 1651-1658, the personal telephone numbers of the signatories were redacted. These are irrelevant and constitute personal information of individuals not parties to this case. Unredacted copies of these statements will not be produced.

As we advised you during our September 9 telephonic meet and confer, based on our present knowledge, it is our understanding that Mr. Gordon has produced all electronic images and files in his possession that are relevant to this case. Defendants' understanding that Mr. Gordon has produced only the discs that were deposited with the Copyright Office is incorrect. We refer you to JG 1692-1693, which identify thousands of native files of Mr. Gordon's prior website material.

Defendants' current request for "any electronic images or files relating to any of the characters that were included on Mr. Gordon's website" is overbroad because it seeks images and files relating to Mr. Gordon's works that are not at issue in this case. Please explain the basis for this request, and the relevancy of such images and files.



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Lastly, while Mr. Madera noted that Mr. Gordon has computers, Mr. Madera also noted that these computers were recently purchased by Mr. Gordon and do not contain any files relevant to this litigation. For this reason, we do not understand the basis for Defendants' reiteration of their request for a forensic examination of Mr. Gordon's computers, and we do not intend to produce them for forensic examination.

Very truly yours,

s/ Kristen McCallion

cc: Julia Huston, Esq. (by email)
David A. Kluft, Esq. (by email)
Jonathan Zavin, Esq. (by email)
John Shope, Esq. (by email)
Mark A. Fischer, Esq. (by email)