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June 18, 2010

Honorable Jeanne J. Graham
U.S. Magistrate Judge
U.S. District Court for the District of Minnesota
342 Federal Building
316 North Robert Street
St. Paul, Minnesota 55101

Re: Timebase v. Thomson (07 CV 1687)

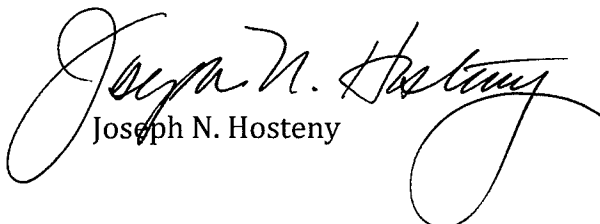
Dear Judge Graham:

We just received the defendants' letter to the Court. These revised requests were not communicated to us before we sent our letter. The last version of the requests I received prior to our letter yesterday contained the language that TimeBase objected to, which could have caused the depositions to occur after the close of fact discovery.

These revised requests now provide that these depositions must occur, if at all, prior to September 1, 2010. We do believe that these requests are tardy, but TimeBase withdraws its objection regarding the close of fact discovery. We do not agree with all that the defendants say.

We appreciate the Court's attention.

Sincerely,


Joseph N. Hosteny

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JNH:mk

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