

EXHIBIT J

Jennifer Johnson

From: Jennifer Johnson
Sent: Wednesday, February 16, 2011 4:28 PM
To: 'Colby Williams'
Cc: 'Kurt Opsahl'; Laurence Pulgram; Clifford Webb; 'shawn@manganolaw.com'
Subject: RE: Righthaven v. DU

Colby,

I write to clarify one point from my previous letter of February 10, 2011 memorializing our meet and confer regarding Stephens Media's discovery responses. Among other topics, we discussed Stephens Media's objection to a number of Requests for Production on the grounds that they were "unlimited in time." We had discussed the possibility of limiting those requests to January 1, 2010 through the present and you had promised to get back to us on whether Stephens Media would agree to that limitation. However, a number of the requests that Stephens Media objected to on this basis relate to matters for which pre-2010 discovery would be crucial, including the formation of Righthaven and its relationship with Stephens Media and potential market harm under a fair use analysis. Specifically, Request for Production Nos. 26 and 48 are likely to lead to discovery information concerning the market harm analysis and Request for Production Nos. 41, 43-45, and 49-55 are likely to lead discoverable information concerning the formation of Righthaven and its relationship with Stephens Media.

For this limited set of requests, Democratic Underground needs documents that may be created prior to January 1, 2010 and instead proposes that they be limited to January 1, 2009 through the present. Please let us know if Stephens Media will agree to drop its objection to these requests on this basis of this modified time limitation.

Regards,

Jennifer



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From: Jennifer Johnson
Sent: Thursday, February 10, 2011 7:24 PM
To: 'Colby Williams'
Cc: 'Kurt Opsahl'; Laurence Pulgram; Clifford Webb; shawn@manganolaw.com
Subject: Righthaven v. DU

Colby,

Please see the attached correspondence summarizing our meet and confer.

Best,
Jennifer



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