

EXHIBIT W

Jennifer Johnson

From: Jennifer Johnson
Sent: Saturday, February 26, 2011 1:23 AM
To: 'shawn@manganolaw.com'
Cc: 'Kurt Opsahl'; Laurence Pulgram; Clifford Webb; 'Colby Williams'
Subject: RE: Righthaven v. DU

Shawn,

The meet and confer process does not work if we accept your agreements and they are then not fulfilled.

Are you committing to send us by email everything described in my email below, including the privilege log, by Wednesday?

Thanks,
Jennifer

From: shawn@manganolaw.com [<mailto:shawn@manganolaw.com>]
Sent: Friday, February 25, 2011 4:29 PM
To: Jennifer Johnson
Cc: 'Kurt Opsahl'; Laurence Pulgram; Clifford Webb; 'Colby Williams'
Subject: RE: Righthaven v. DU

Jennifer:

I have been tied up with numerous matters (some Righthaven-related and some non-Righthaven-related), but I am working on the issues we discussed. I am trying to have all of the issues addressed by Wednesday. I would appreciate it if you can give me until then to have appropriate responses to you.

Regards,

S

Shawn A. Mangano, Esq.
[Shawn A. Mangano, Ltd.](#)
9960 West Cheyenne Avenue, Suite 170
Las Vegas, Nevada 89129
(702) 304-0432 - telephone
(702) 922-3851 - facsimile
Licensed in California, Nevada and Illinois

----- Original Message -----

Subject: RE: Righthaven v. DU
From: Jennifer Johnson <jjjohnson@fenwick.com>
Date: Fri, February 25, 2011 3:35 pm
To: "'shawn@manganolaw.com'" <shawn@manganolaw.com>
Cc: 'Kurt Opsahl' <kurt@eff.org>, Laurence Pulgram <LPulgram@Fenwick.com>, Clifford Webb <cwebb@fenwick.com>, 'Colby Williams' <jcw@campbellandwilliams.com>

Shawn,

We have still not received supplemental discovery responses from Righthaven. We have also not received any documents from Righthaven, or a privilege log. You agreed to have us a privilege log and non-confidential documents by today. You agreed to produce confidential documents 7-10 days after entry of the protective order. 10 days was yesterday. We expect to hear back from you today as to when we will be receiving this information.

Regards,
Jennifer

From: Jennifer Johnson
Sent: Wednesday, February 23, 2011 1:51 PM
To: 'shawn@manganolaw.com'
Cc: 'Kurt Opsahl'; Laurence Pulgram; Clifford Webb; 'Colby Williams'
Subject: RE: Righthaven v. DU

Shawn,

I'm following up on your promise to have us supplemental responses 10 days after our meet and confer. We have not yet received them. Please serve by email, per our agreement.

Thanks,
Jennifer



JENNIFER J. JOHNSON
Fenwick & West LLP
Associate, Litigation Group
☎ (415) 875-2391
🏠 (415) 281-1350
✉ jjjohnson@fenwick.com

From: Jennifer Johnson [<mailto:jjjohnson@fenwick.com>]
Sent: Thursday, February 10, 2011 7:26 PM
To: 'shawn@manganolaw.com'
Cc: 'Kurt Opsahl'; Laurence Pulgram; Clifford Webb; 'Colby Williams'
Subject: Righthaven v. DU

Shawn,

Please see the attached correspondence summarizing our meet and confer.

Best,

Jennifer



JENNIFER J. JOHNSON

Fenwick & West LLP

Associate, Litigation Group

☎ (415) 875-2391

🏠 (415) 281-1350

✉ jjjohnson@fenwick.com