

EXHIBIT Y

Jennifer Johnson

From: shawn@manganolaw.com
Sent: Thursday, March 03, 2011 2:30 PM
To: Jennifer Johnson
Cc: 'Kurt Opsahl'; Laurence Pulgram; Clifford Webb; 'Colby Williams'
Subject: RE: Righthaven v. DU

Jennifer:

There is no agreement in place that the parties must serve by e-mail and U.S. Mail. There is an agreement that such service comports with FRCP 5 and is to be deemed service by hand delivery when made by such means. With regard to the production, I agreed to produce those materials that were responsive to the request. Such materials will be produced when they are located.

With regard to the privilege log, you recently clarified issues relating to the required contents in response to Colby Williams' inquiry. If there are materials being withheld on privilege grounds, they will be included in a privilege log and provided 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: Thu, March 03, 2011 2:23 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,

Thank you. Please also send us a copy via email, as previously agreed upon (see attached). Additionally, when can we expect to receive Righthaven's documents and privilege log which you agreed to produce last week?

Regards,
Jennifer

From: shawn@manganolaw.com [<mailto:shawn@manganolaw.com>]
Sent: Thursday, March 03, 2011 1:28 PM

To: Jennifer Johnson
Cc: 'Kurt Opsahl'; Laurence Pulgram; Clifford Webb; 'Colby Williams'
Subject: RE: Righthaven v. DU

Jennifer:

Supplemental discovery responses were sent out to you today.

Regards,

S

Shawn A. Mangano, Esq.
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----- Original Message -----

Subject: RE: Righthaven v. DU
From: Jennifer Johnson <jjjohnson@fenwick.com>
Date: Thu, March 03, 2011 10:05 am
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>

Dear Shawn,

I did not receive any discovery from you yesterday, as you had most recently promised. Did I miss something? Please advise as to the status of your supplemental responses, document production, and privilege log.

Thanks,
Jennifer



JENNIFER J. JOHNSON

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✉ jjjohnson@fenwick.com

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.

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----- 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



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✉ 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



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