

EXHIBIT EE

Jennifer Johnson

From: Jennifer Johnson
Sent: Thursday, March 24, 2011 4:41 PM
To: shawn@manganolaw.com
Cc: Laurence Pulgram; Kurt Opsahl; Clifford Webb; 'Colby Williams'
Subject: Righthaven v. DU

Shawn,

You agreed that you would get back to us regarding Righthaven's production of documents by March 2. We have still not received any documents. Additionally, on March 3, you told us you would send the privilege log "shortly." We have not yet received a log either. We have not heard from you since March 3 regarding either Righthaven's production of documents or production of a privilege log. You continue to abuse the discovery process. If you have any intention to comply with your discovery obligations, you have yet to demonstrate so.



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