

EXHIBIT 4

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December 17, 2010

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BY EMAIL AND U.S. MAIL

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Re: Arista Records LLC et al. v. Lime Wire LLC et al.,
No. 06 CV 5936 (KMW) (U.S. DIST. CT. S.D.N.Y.)

Dear Mr. Netzer:

Following up on our call from earlier today with the Court, we understand that you will be producing promptly the materials requested in my letter of December 15, 2010. With respect to non-public matters where Mr. Korn has worked with one or more of the members of the Lime Wire team at Willkie Farr, you can identify those matters as "Matter A," "Matter B," "Matter C," etc., as was discussed during the call.

Based upon your representations during the call today as to what has transpired at Willkie Farr, we need the following information in advance of the depositions authorized by the Court:

- All documents relating to whatever disclosures Mr. Korn was required to make and/or did make to Willkie Farr with respect to his work on the Lime Wire matter at Cravath at the time he joined Willkie Farr.

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- All communications to or from Mr. Korn within Willkie Farr that refer to either Lime Wire, Mark Gorton, Tower Research Capital LLC or Tower Research Capital Investments LLC (the “Tower Entities”).
- Documents relating to Willkie Farr’s discovery in June 2010 that Mr. Korn had worked at Cravath on the Lime Wire matter (including any documentation generated by Willkie Farr’s conflict system), and documents relating to whatever steps Willkie Farr took in response to that discovery.

Given the gravity of the situation and the Court’s ordering of expedited discovery on the issue, we request that these materials and the information and documents requested in my December 15, 2010 letter be provided to us no later than the close of business on Monday, December 20, 2010. To the extent that you contend that any of the materials we have requested are privileged, we will need a privilege log documenting those claims of privilege.

Moreover, pursuant to the Court’s order, we would like to have the following individuals deposed on Wednesday and Thursday of next week (December 22-23, 2010):

- Jeffrey Korn
- Tariq Mundiya
- Todd Cosenza
- A 30(b)(6) Willkie Farr witness (or witnesses) with knowledge of the following topics:
 - The information technology (IT) systems at Willkie Farr and what specific protections were put in place through those systems to ensure that Mr. Korn did not, and currently does not, have access to anything relating to Willkie Farr’s representation of any of the Defendants in this case or any of their affiliates, including the Tower Entities.
 - Willkie Farr’s general policies and procedures with respect to attorney conflicts, including whatever systems are in place to determine the existence of a conflict and whatever screening measures that are implemented in response to a conflict.
 - The specific policies and procedures, including any screening measures, that Willkie Farr implemented when it became aware of Mr. Korn’s conflict.
 - When Willkie Farr first began representing any of the defendants in this case or any of their affiliates, including the Tower Entities.

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We will plan on discussing with you on Monday the times that these witnesses are available for depositions on Wednesday and Thursday.

Unless and until Willkie Farr decides to withdraw as counsel for Defendants in this case, we do not expect any of the requested discovery or briefings relating to this issue to be used as a basis for delaying any of the proceedings in this matter. Our clients continue to expressly reserve all of their rights in connection with this matter.

Sincerely,

A handwritten signature in blue ink that reads "Kelly M. Klaus" followed by a stylized flourish or initials.

Kelly M. Klaus