

Exhibit J

Horan, Paul

From: Horan, Paul
Sent: Monday, February 07, 2011 11:11 AM
To: 'Ingber, Matthew D.'
Cc: Eaton, Mary
Subject: RE: Arista Records LLC v. Lime Group LLC
Attachments: 6354467_1.doc

Matt:

In response to your question, footnote 3 of Judge Freeman's order directs Google and the other licensees "to use their own judgment as to the best means of locating the communications covered by this Order." That places the obligation on Google, not Defendants, to propose a list of custodians. Of course, we are willing to discuss any list you do propose and the reasons for including or excluding particular custodians.

The approach ordered by Judge Freeman makes perfect sense because Google has superior knowledge of which custodians are more likely to have responsive communications. Unfortunately, we cannot simply look to Plaintiffs' production to identify an exhaustive list of custodians because (among other reasons) Plaintiffs' production of such communications was not complete. That said, in response to your email, we have reviewed the documents produced by Plaintiffs and have been able to discern that the individuals at Google on the attached list communicated with Plaintiffs. As you can see, in some cases, the communication only listed an email address, but no name. This non-exhaustive list can provide a good starting point for arriving at a universe of custodians whose files would be searched.

As mentioned previously, Google's production of documents ordered by Judge Freeman needs to commence without further delay. Accordingly, please let us know when that production will begin.

Very truly yours,

Paul W. Horan
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From: Ingber, Matthew D. [mailto:MIingber@mayerbrown.com]
Sent: Friday, February 04, 2011 9:16 AM
To: Horan, Paul
Cc: Eaton, Mary
Subject: RE: Arista Records LLC v. Lime Group LLC

Paul – Thanks for sending us the order; I hadn't received it before your email. I do not read the order as "requiring" us to "identify" anything, but we are happy to discuss process once we've decided on our next steps.

In the meantime, as we think about our options in light of Judge Freeman's order, it would be helpful to know what you view as the best means of locating the communications. In particular, do you have any Google/YouTube custodians in mind based on your review of plaintiffs' communications with them?

Thanks,

Matt

From: Horan, Paul [mailto:phoran@willkie.com]
Sent: Wednesday, February 02, 2011 4:32 PM
To: Ingber, Matthew D.
Cc: Eaton, Mary
Subject: Arista Records LLC v. Lime Group LLC

Dear Matthew:

As you know, Judge Freeman entered the attached order yesterday, requiring your client to produce certain communications in response to Defendants' subpoena in the above-referenced action. Specifically, your client must produce communications, both internal and with Plaintiffs, relating to its licenses with Plaintiffs and/or relating to LimeWire, to the extent those communications reflect information regarding Plaintiffs' conduct, positions, or views about online licensing or about LimeWire.

We need to receive the documents your client has now been ordered to produce without further delay. Please let us know when we can expect to receive the documents. Also, as you know, the Court's order requires your client to identify the "best means of locating the communications covered by" the Order. Please let us know how your client intends to search for the communications to be produced.

Very truly yours,

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