

# **Exhibit J**

## Horan, Paul

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**From:** Jeffrey P. Weingart [jpw@msf-law.com]  
**Sent:** Monday, February 07, 2011 1:21 PM  
**To:** Horan, Paul  
**Cc:** Eaton, Mary; Jeffrey Kimmel  
**Subject:** RE: Arista Records LLC v. Lime Group LLC

Paul:

You have mischaracterized the nature and tone, as well as substance of our discussion.

First, I emphasized several times that my clients intend to comply in all respects with the Order.

Second, I proposed to produce the documents on March 4<sup>th</sup>. You indicated that you would confer with your team to see if that was acceptable and that you would let me know. I told you that I thought 30 days to produce the documents was reasonable. You agreed, but then asked me to commit to an earlier, unspecified date for some production. I indicated I was reluctant to commit to a date certain for rolling production at this time, but that we would make reasonable efforts to produce documents on a rolling basis before March 4<sup>th</sup> as they become available. As I indicated, iMesh and MusicLab have no reason to artificially hold up the production until March 4<sup>th</sup> if documents are ready to be produced before that date – nor do they intend to do so. In this vein, I anticipate that some production could be made as early as Friday, February 18<sup>th</sup>.

As I told you, per the Order, my clients intend to use their judgment, reasonably exercised, as to the best means of locating the communications covered by the Order. My understanding of the Order is that iMesh and MusicLab are not required to use specific search terms or the like – if you have a different understanding, please let me know. The search that is being conducted includes the retrieval and review of emails and attachments from iMesh and MusicLab computers that fall into the categories specified in the Order. iMesh and MusicLab have already begun to collect those communications and expect to produce responsive documents once they have been reviewed by counsel.

Paul, as I indicated, iMesh and MusicLab intend to be cooperative and compliant with respect to the production ordered by the Court. Instead of being combative with an eye toward creating issues where there are none, I would ask that you allow that cooperation to happen.

I am more than willing to continue discussing any concerns you may have, including with respect to scheduling and timing of production. Please let me know.

Regards,

Jeff

Jeff Weingart  
Meister Seelig & Fein LLP  
(212) 655-3516

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**From:** Horan, Paul [mailto:phoran@willkie.com]  
**Sent:** Monday, February 07, 2011 11:33 AM  
**To:** Jeffrey P. Weingart  
**Cc:** Eaton, Mary; Jeffrey Kimmel  
**Subject:** RE: Arista Records LLC v. Lime Group LLC

Jeff:

As you know, we spoke by telephone on Friday, February 4, 2011, concerning Judge Freeman's January 31, 2011 order. During our call, you stated that your clients needed until Friday, March 4, 2011, to produce the documents required by Judge Freeman's order. You also stated that, in the event your clients' production was ready before that date, you would produce the documents when they were ready and would not wait until March 4, 2011, to produce them. I asked if you would commit to producing documents on a rolling basis, with an initial production to take place on an earlier date certain and the production to be complete by March 4, 2011. You said you were not willing to do so. You also said you did not believe Judge Freeman's order obligated your clients to inform Defendants how they intend to locate responsive documents, and that you were not willing to disclose that information.

Please let me know as soon as possible if I have misstated your positions in any way.

Defendants' position is that iMesh's/MusicLab's production should commence without further delay, that a deadline of March 4, 2011, is unreasonably late under the circumstances, and that your unwillingness to commit to an earlier, rolling production or to disclose the means by which your client will locate responsive documents also is unreasonable. Defendants reserve all rights with respect to these issues.

Very truly yours,  
Paul

Paul W. Horan  
Willkie Farr & Gallagher LLP  
787 Seventh Avenue  
New York NY 10019  
(212) 728-8614 (phone)  
(212) 728-8111 (fax)

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**From:** Jeffrey P. Weingart [mailto:jpw@msf-law.com]  
**Sent:** Friday, February 04, 2011 10:03 AM  
**To:** Horan, Paul  
**Cc:** Eaton, Mary; Jeffrey Kimmel  
**Subject:** RE: Arista Records LLC v. Lime Group LLC

Paul:

We are in the process of conferring with our clients about the order, and I will be in touch with you to discuss scheduling matters. As the Court indicates in the order, our clients will use their own judgment as to the best means of locating the communications covered by the order.

Regards,

Jeff

Jeff Weingart  
Meister Seelig & Fein LLP  
(212) 655-3516

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**From:** Horan, Paul [mailto:phoran@willkie.com]  
**Sent:** Friday, February 04, 2011 9:56 AM  
**To:** Jeffrey P. Weingart

**Cc:** Eaton, Mary  
**Subject:** RE: Arista Records LLC v. Lime Group LLC

Jeff:

We have not received any response from you. Please advise as to how your clients intend to search for the documents they have been ordered to produce, and when that production will occur.

Paul

Paul W. Horan  
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New York NY 10019  
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(212) 728-8111 (fax)

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**From:** Horan, Paul  
**Sent:** Wednesday, February 02, 2011 4:26 PM  
**To:** 'Jeffrey P. Weingart'  
**Cc:** Eaton, Mary  
**Subject:** Arista Records LLC v. Lime Group LLC

Dear Jeff:

As you know, Judge Freeman entered the attached order yesterday, requiring your clients to produce certain communications in response to Defendants' subpoena in the above-referenced action. Specifically, your clients must produce communications, both internal and with Plaintiffs, relating to their 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 clients have 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 clients to identify the "best means of locating the communications covered by" the Order. Please let us know how your clients intend to search for the communications to be produced.

Very truly yours,

Paul W. Horan  
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