## **Exhibit J**

From:

Turner, Robert C. [RTurner@winston.com]

Sent:

Friday, February 04, 2011 9:42 AM

To:

Kozusko, Dan; Christy, lan

Cc:

Eaton, Mary

Subject:

RE: Arista Records LLC v. Lime Group LLC

**Categories:** 

**Red Category** 

Dan – As I'm sure you're aware, Yahoo!, and indeed any non-party addressed in Magistrate Judge Freeman's Order, has every right to object to the contents of that Order, pursuant to Fed. R. Civ. P. 72(a). Any discussion of "how Yahoo! intends to search" for documents is premature prior to a determination by my client as to whether objections will be filed. While I appreciate your overly apparent concern with our lack of response to an email sent just over 36 hours ago, I also respectfully disagree with Defendants' representation that the Order "requires [my] client to identify the 'best means of locating the communications covered by' the Order." Indeed, Magistrate Judge Freeman simply states in footnote 3 that "the Licensees . . . should, in the end, use their own judgment as to the best means of locating the communications covered by this Order." I fail to see how this *requires* Yahoo! to identify such means of location to Defendants. Regardless of our opposing semantic opinions, until such time as Yahoo! either files objections to the Order or agrees to produce the communications included thereunder, it makes little sense to discuss the means and timing of any further production.

Regards,

Robert Turner

## **Robert Turner**

D: +1 (212) 294-3538 www.winston.com

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From: Kozusko, Dan [mailto:dkozusko@willkie.com]

Sent: Friday, February 04, 2011 9:03 AM

To: Christy, Ian; Turner, Robert C.

Cc: Eaton, Mary

Subject: RE: Arista Records LLC v. Lime Group LLC

We have not received any response from you. Please advise us forthwith how Yahoo! intends to search for the documents that Judge Freeman has ordered it to produce and when that production will occur.

Dan C. Kozusko
Willkie Farr & Gallagher LLP
787 Seventh Avenue
New York, New York 10019
(212) 728-8694 (phone)
(212) 728-9694 (fax)
dkozusko@willkie.com

----Original Message----

From: Christy, Ian

Sent: Wednesday, February 02, 2011 5:03 PM

To: 'Turner, Robert C.'

Cc: Eaton, Mary; Kozusko, Dan

**Subject:** Arista Records LLC v. Lime Group LLC

Dear Mr. Turner:

As you know, Judge Freeman entered the attached order yesterday, requiring your client, Yahoo! Inc., 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,

Ian M. Christy
Willkie Farr & Gallagher LLP
787 Seventh Avenue
New York, NY 10019
212-728-8659 (Phone)
212-728-9659 (Fax)
ichristy@willkie.com

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