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December 18, 2009

By Hand

Hon. Donald C. Pogue  
U.S. Court of International Trade  
One Federal Plaza  
New York, New York 10278-0001

Re: John Wiley & Sons, Inc. v. Kirtsang  
08 Civ. 7834 (DCP)

Dear Judge Pogue:

We are attorneys for plaintiff John Wiley & Sons, Inc. in the above action. We are writing pursuant to Rule 37.2 of the Civil Rules to request a conference to address a post-judgment discovery dispute.

The Court entered judgment for \$600,000 on November 17, 2009, based upon the jury verdict. On December 8, 2009, we noticed the deposition of defendant Supap Kirtsang, concerning enforcement of the judgment, for December 23, 2009 at 1:00 p.m. (EST).

On December 9, 2009, we e-mailed defendant's counsel, Mr. Israel, to confirm receipt of the notice of deposition, which he confirmed later that day.

On December 16, 2009, we e-mailed Mr. Israel to confirm that the defendant planned to attend his deposition as scheduled. Later that day, Mr. Israel responded by e-mail that Mr. Kirtsang would not attend because he had not yet spoken to Mr. Kirtsang about the deposition and because Mr. Israel had prior commitments.

On December 17, 2009, we called Mr. Israel to discuss the scheduling of the deposition. He stated that he still had not spoken to Mr. Kirtsang about the deposition.

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We respectfully request that the Court schedule a telephone conference to address when we may depose Mr. Kirtsaeng.

Respectfully yours,

A handwritten signature in blue ink that reads "William Dunnegan". The signature is written in a cursive, flowing style.

William Dunnegan

Cc: Sam P. Israel, Esq. (By E-mail)