



Cowan, Liebowitz & Latman, P.C.  
1133 Avenue of the Americas  
New York, NY 10036

(212) 790-9200 Tel  
(212) 575-0671 Fax  
[www.cll.com](http://www.cll.com)

**Richard S. Mandel**  
(212) 790-9291  
[rsm@cll.com](mailto:rsm@cll.com)

December 30, 2014

**Via Email**

Hon. Richard J. Sullivan  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Capitol Records, LLC v. ReDigi Inc., 12 cv. 0095 (RJS)

Dear Judge Sullivan:

We represent Plaintiffs in the above-referenced action. Further to my letter of December 19, 2014, Defendant ReDigi Inc. has now agreed to remove confidentiality designations for any excerpts of the Ossenmacher deposition included in Exhibit B to the Declaration of Richard S. Mandel, Esq. recently submitted by Capitol with respect to the pending res judicata issue before the Court. Accordingly, we have today refiled via ECF another version of the Mandel Declaration, which includes a complete set of the deposition excerpts relied on by Capitol on the motion. The full excerpts were previously included in the courtesy copy delivered by Capitol to the Court.

Respectfully,

A handwritten signature in black ink, appearing to read 'Richard S. Mandel', is written over a light blue horizontal line.

Richard S. Mandel

cc: Gary Adelman, Esq. (via email)  
Sarah Matz, Esq. (via email)  
James J. Pizzirusso, Esq. (via email)  
Nathaniel Giddings, Esq. (via email)  
Jonathan Z. King, Esq. (via email)