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August 8, 2011

VIA ELECTRONIC MAILNathan Shaman, Esq.
Jeffrey A. Lake A.P.C.
835 5th Avenue, Suite 200A
San Diego, California 92101Re: Ceglia v. Zuckerberg and Facebook, Inc., No. 1:10-cv-569 (RJA)

Dear Mr. Shaman:

We write in response to your letter dated today, August 8, 2011.

As we informed you before you filed Plaintiff's Motion to Compel, Defendants have gathered and are prepared to produce all of the emails specified by the Court's July 1, 2011 order (the "Order"). But as we have repeatedly explained – in our July 15, 2011 email, our July 20, 2011 letter, and our Cross-Motion and Opposition, filed on August 4, 2011 – Plaintiff's compliance with his obligations under the Order is an explicit precondition to Defendants' production of those emails. *See* Order at 2 (providing that "five (5) days subsequent to Plaintiff's production of the Electronic Assets and his sworn declaration, Defendants shall produce all emails ..."). The Court sequenced discovery in this manner due to concerns that Plaintiff could use the authentic emails as a roadmap to deepen the fraud that pervades this case.

Because Plaintiff has defied his production obligations under the Order, Defendants are not yet required to produce the emails from Mr. Zuckerberg.

Very truly yours,

Handwritten signature of Orin Snyder in blue ink, followed by the initials "AA".

Orin Snyder

cc: Jeffrey Lake, Esq.
Paul Argentieri, Esq.