

## **Exhibit A**

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**From:** John Lane  
**Sent:** Friday, December 18, 2009 10:27 AM  
**To:** Hansen, Shawn  
**Cc:** Garland Stephens; David Healey  
**Subject:** EMG documents and other information

Shawn –

Please produce the following documents:

1. All documents related to any patents or patent applications where Elliot and/or Grant Gottfurcht are named inventors. The documents EMG has produced so far indicate that Elliot Gottfurcht is a named inventor on at least 30 patent applications, but EMG has not produced documents related to these applications aside from the applications that led to the two patents-in-suit.
2. All documents and other information related to EMG's negotiations with **REDACTED** and any other non party.
3. All documents from any developers and/or programmers Elliot Gottfurcht has worked with since July 1999, including without limitation Online Labs, Protovu, Art & Logic and Verkata. Also, please produce all documents showing that Mr. Gottfurcht and EMG have complied with their obligation to ensure that these entities have preserved all relevant documents and information. These companies have been working under the direction of Elliot Gottfurcht and EMG clearly has an obligation to ensure that they preserve and produce documents.
4. All documents and information concerning Fogey & Jack, Worldmatrix, MallTV and any other hardware, software or code Elliot and/or Grant Gottfurcht have developed since July 1999, or was developed on Elliot and/or Grant Gottfurcht's behalf.
5. All documents concerning the E-General Store.

I have not had a chance to fully review the Elliot and Grant Gottfurcht deposition transcripts, and will get back to you once I have had a chance to do so and identify other relevant documents that EMG has not produced.

Thanks,

John

John R. Lane

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