

EXHIBIT 2

Joshua Sohn

From: Emily O'Brien
Sent: Thursday, March 29, 2012 12:47 PM
To: Monterio, Charles
Cc: zz-IP Engine; QE-IP Engine; Noona, Stephen E.
Subject: I/P Engine
Attachments: 4655316_1_3.28.2012 Proposed Stipulation.doc; 4510860_6_Proposed ESI Agreement 3 28 12.doc

Charles, please find attached our current proposed stipulation regarding discovery. Given that the parties have not been able to reach agreement regarding the language regarding contentions, we have removed that language entirely from the stipulation.

Additionally, I have discussed the proposed ESI Agreement with the team. Given that the parties have agreed to language regarding voicemail and IM, we do not feel it is necessary or appropriate to investigate this issue further with our client. If this becomes an issue in the future, we can discuss at that time.

There is one addition we would like to make to the ESI Agreement. We have added in redline a sentence stating that the parties agree that only sent and received custodial emails will be searched. Please let us know if Plaintiff is agreeable to this revision, and if we now have final agreement on the ESI and discovery stipulations.

Thank you,
Emily

Emily O'Brien
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