

Ray Beckerman

From: Thomas Mullaney [tmm@mullaw.org]
Sent: Thursday, January 31, 2008 5:37 PM
To: Ray Beckerman; Timothy.Reynolds@hro.com; Morlan Ty Rogers; richard.gabriel@hro.com; patrick.train-gutierrez@hro.com; vkao@rc.com
Subject: RE: UMG v Lindor subpoena MediaSentry

Ray,

There are not

Thanks

Tom

Law Offices of Thomas M. Mullaney
708 Third Avenue, Suite 2500
New York, NY 10017
(212) 223-0800 (tel)
(212) 661-9860 (fax)
tmm@mullaw.org (e-mail)
www.mullaw.org (web)

This communication (including any attachments) is intended for the use of the intended recipient(s) only and may contain information that is confidential, privileged or legally protected. Any unauthorized use or dissemination of this communication is strictly prohibited. If you have received this communication in error, please immediately notify the sender by return e-mail message and delete all copies of the original communication. Thank you for your cooperation.

From: Ray Beckerman [mailto:rbeckerman@vanfeliu.com]
Sent: Wednesday, January 30, 2008 11:16 AM
To: Thomas Mullaney; Timothy.Reynolds@hro.com; Morlan Ty Rogers; richard.gabriel@hro.com; patrick.train-gutierrez@hro.com; vkao@rc.com
Subject: RE: UMG v Lindor subpoena MediaSentry

Thanks, Tom.
So are there any other materials you would be producing but for a suitable confidentiality stipulation?
Best regards
Ray

Ray Beckerman
Vandenberg & Feliu LLP
110 East 42 St.
New York, NY 10017
(212) 763-6800 Fax: (212) 763-6810
Direct dial: (212)763-6809
Email: rbeckerman@vanfeliu.com
Web site: <http://www.vanfeliu.com>

THIS MESSAGE AND ANY ATTACHMENT(S) ARE CONSIDERED CONFIDENTIAL AND/OR PRIVILEGED AND ARE FOR USE BY THE INTENDED RECIPIENT ONLY. IT IS NOT INTENDED TO PROVIDE OR CONTAIN TAX ADVICE. PLEASE CLICK ON THE FOLLOWING LINK FOR FURTHER IMPORTANT INFORMATION ABOUT THIS DISCLAIMER: www.vanfeliu.com/emaildisclaimer.htm

From: Thomas Mullaney [mailto:tmm@mullaw.org]
Sent: Wednesday, January 30, 2008 10:28 AM
To: Ray Beckerman; Timothy.Reynolds@hro.com; Morlan Ty Rogers; richard.gabriel@hro.com; patrick.train-gutierrez@hro.com; vkao@rc.com
Subject: RE: UMG v Lindor subpoena MediaSentry

Ray.

I think it would be best to accord all of Mr. Mizzone's resume Confidential treatment.

Tom

Law Offices of Thomas M. Mullaney
708 Third Avenue, Suite 2500
New York, NY 10017
(212) 223-0800 (tel)
(212) 661-9860 (fax)
tmm@mullaw.org (e-mail)
www.mullaw.org (web)

This communication (including any attachments) is intended for the use of the intended recipient(s) only and may contain information that is confidential, privileged or legally protected. Any unauthorized use or dissemination of this communication is strictly prohibited. If you have received this communication in error, please immediately notify the sender by return e-mail message and delete all copies of the original communication. Thank you for your cooperation.

From: Ray Beckerman [mailto:rbeckerman@vanfeliu.com]
Sent: Monday, January 28, 2008 6:45 PM
To: Thomas Mullaney; Timothy.Reynolds@hro.com; Morlan Ty Rogers; richard.gabriel@hro.com; patrick.train-gutierrez@hro.com; vkao@rc.com
Subject: RE: UMG v Lindor subpoena MediaSentry

Dear Tom,

Thanks for getting back to me.

1. I understand fully your responses on items 1 and 2.
3. On item 3 I fully understand your response, but would note that you did object on the grounds of privilege.
4. On item 4 I have a couple of questions:
 - (a) is Mr. Mizzone's resume the only thing you would be providing but for the lack of a suitable confidentiality order?
 - (b) is it the entire resume that you feel merits confidentiality, or just his contact information, or certain other parts?

Thanks again.

Sincerely yours,

Ray

Ray Beckerman

Vandenberg & Felio LLP
110 East 42 St.
New York, NY 10017
(212) 763-6800 Fax: (212) 763-6810
Direct dial: (212)763-6809
Email: rbeckerman@vanfelio.com
Web site: <http://www.vanfelio.com>

THIS MESSAGE AND ANY ATTACHMENT(S) ARE CONSIDERED CONFIDENTIAL AND/OR PRIVILEGED AND ARE FOR USE BY THE INTENDED RECIPIENT ONLY. IT IS NOT INTENDED TO PROVIDE OR CONTAIN TAX ADVICE. PLEASE CLICK ON THE FOLLOWING LINK FOR FURTHER IMPORTANT INFORMATION ABOUT THIS DISCLAIMER: www.vanfelio.com/emaildisclaimer.htm

From: Thomas Mullaney [mailto:tmm@mullaw.org]
Sent: Monday, January 28, 2008 5:20 PM
To: Ray Beckerman; Timothy.Reynolds@hro.com; Morlan Ty Rogers; richard.gabriel@hro.com; patrick.train-gutierrez@hro.com; vkao@rc.com
Subject: RE: UMG v Lindor subpoena MediaSentry

Dear Ray,

1. That's fine.
2. No.
3. Our search did not generate any responsive, privileged documents.
4. The resume of Mr. Mizzone we would require to be treated as confidential.

Please let me know if you have any further questions.

Tom

Law Offices of Thomas M. Mullaney
708 Third Avenue, Suite 2500
New York, NY 10017
(212) 223-0800 (tel)
(212) 661-9860 (fax)
tmm@mullaw.org (e-mail)
www.mullaw.org (web)

This communication (including any attachments) is intended for the use of the intended recipient(s) only and may contain information that is confidential, privileged or legally protected. Any unauthorized use or dissemination of this communication is strictly prohibited. If you have received this communication in error, please immediately notify the sender by return e-mail message and delete all copies of the original communication. Thank you for your cooperation.

From: Ray Beckerman [mailto:rbeckerman@vanfelieu.com]

Sent: Saturday, January 26, 2008 3:46 PM

To: Thomas Mullaney; Timothy.Reynolds@hro.com; mtrogers@VANFELIU.com; richard.gabriel@hro.com; patrick.train-gutierrez@hro.com; vkao@rc.com

Subject: UMG v Lindor subpoena MediaSentry

Dear Tom

After reviewing your initial response, I have some followup questions:

1. Is it acceptable to you that we treat the deposition of MediaSentry as being adjourned *sine die* at this time, without the need for service of a new subpoena when we reschedule it?
2. Are you asking for confidential treatment at this time as to any part of what you have furnished, which appears to consist exclusively of publicly filed litigation documents?
3. Are you planning to furnish us with a privilege log in compliance with the rules of the Eastern District of New York? If so, when can we expect to receive same?
4. You have indicated that there are other materials which you would furnish but for the need to enter into a suitable confidentiality stipulation. Please advise what materials you would be furnishing, and to which item numbers they would be responsive.

Thank you.

Sincerely yours,

Ray

Ray Beckerman

Vandenberg & Feliu LLP

110 East 42 St.

New York, NY 10017

(212) 763-6800 Fax: (212) 763-6810

Direct dial: (212)763-6809

Email: rbeckerman@vanfelieu.com

Web site: <http://www.vanfelieu.com>

THIS MESSAGE AND ANY ATTACHMENT(S) ARE CONSIDERED CONFIDENTIAL AND/OR PRIVILEGED AND ARE FOR USE BY THE INTENDED RECIPIENT ONLY. IT IS NOT INTENDED TO PROVIDE OR CONTAIN TAX ADVICE. PLEASE CLICK ON THE FOLLOWING LINK FOR FURTHER IMPORTANT INFORMATION ABOUT THIS DISCLAIMER: www.vanfelieu.com/emaildisclaimer.htm