

Date: Fri, 30 May 2008 15:07:11 -0700 (PDT)
From: "Michael Gunlicks" <michael@gunlickslaw.com>
Subject: RE: USA v. Dove: Production of Documents
To: Orit_Michiel@mpaa.org

Dear Orit,

Thank you for the documents. We spoke earlier today regarding whether or not these are in fact all the documents that reference Daniel Dove. My major query regards whether any of the documents that reference "duffman" do not also in part reference Daniel Dove. I was to receive a return call regarding this information but have not yet heard back.

The second issue that I have with the documents that you produced regards the portion of the documents that was redacted, namely information on pages 3 and 4 of the documents that you produced. Please provide the reason for the redaction and identify the nature of the redacted communication. If you assert that the reason for the redaction is privilege, please specify on which privilege basis you are relying and what facts regarding the redacted information support the claim of privilege.

Thank you very much.

Sincerely,
Michael

Gunlicks Law, LC
604 N. Boulevard
Richmond, VA 23220
804-355-9700
fax: 355-4933

Orit_Michiel@mpaa.org wrote:
Subject: RE: USA v. Dove: Production of Documents
Date: Thu, 29 May 2008 15:43:32 -0700
From: <Orit_Michiel@mpaa.org>
To: <michael@gunlickslaw.com>

Dear Mr. Gunlicks,

Your understanding appears accurate. Additionally, as we discussed in our call today, I will send a copy of my cover letter to the Clerk of the Court without the enclosed documents. Should the Court request copies of the documents, we will

respond and provide the requested information. The materials have been sent to you by FedEx, tracking number: 8653 9982 5899.

Sincerely,
Orit

Orit H. Michiel
Motion Picture Association of America, Inc.
15301 Ventura Boulevard
Building E
Sherman Oaks, CA 91403
phone: (818) 995-6600
direct dial: (818) 935-5810

From: Michael Gunlicks [mailto:michael@gunlickslaw.com]
Sent: Thursday, May 29, 2008 12:33 PM
To: Michiel, Orit
Subject: USA v. Dove: Production of Documents

Dear Ms. Michiel,

I am writing to confirm our agreement for the production of documents by the MPAA pursuant to the Subpoena Duces Tecum issued by the US District Court of the Western District of Virginia in the matter of USA v. Dove.

Pursuant to our understanding, the MPAA will forward all responsive documents that it has located to my office, to Mr. Tyler Newby of the Department of Justice, and to the office of the clerk of court, Abingdon Division of the US District Court, WDVA. It is further agreed that I will be in receipt of those documents tomorrow.

Please provide the tracking number of the shipment made to my office upon shipment of the documents in order that I can advise my client of the status of the production.

Thank you for your assistance,
Michael Gunlicks

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