
From: Brett Gibbs [mailto:blgibbs@wefightpiracy.com]
Sent: Wednesday, January 18, 2012 3:36 PM
To: Steven Yuen
Subject: 11-5630 - Deposition of Ms. Wong; Settlement Proposal

Mr. Yuen:

Per the attached Court Order, my client, Hard Drive Productions, Inc. has been given the opportunity to depose Ms. Wong in the matter of Hard Drive Productions, Inc. v. John Doe, 3:11-cv-5630. I intend to set up that deposition in the next week, and take Ms. Wong's deposition sometime in the next month.

As lead counsel for Plaintiff in this matter, I am emailing you to try to meet and confer with you about a date/time period in which to set up this deposition. Hopefully, both parties can agree on a date/time slot that work with everyone's schedules. Please call me or email me back so that we can discuss this.

If I don't hear back from you on this issue by **Monday, January 23, 2012**, and/or we can't work out a time/date that is mutually agreeable by that time, I will simply schedule a time/date that works best for my schedule. Considering your past delays in this case, this deadline is firm.

Further, I just want to confirm that your firm would accept service of the deposition subpoena on Ms. Wong's behalf. You had mentioned that you would do so in previous correspondence, but I just wanted to confirm that this remains your stance.

Also, my client is always open to settling this matter before going into this potentially costly deposition. In light of this, Plaintiff offers Ms. Wong a settlement offer of **\$3,000**, lump sum, to voluntarily dismiss the case with prejudice, and not pursue the court-authorized deposition. Additionally, we can set up the settlement to cover *any and all* individuals who may have used Ms. Wong's IP address to infringe on my client's copyrighted works. In other words, this settlement would cover members of Ms. Wong's household as well, and all names would stay anonymous. Again, the choice is hers. Please present our offer to her with all of the background. My client will entertain reasonable counteroffers should Ms. Wong make the proposal, but, if not, I suggest we work out a deposition date/time as soon as practicable.

Either way, please get back to me by **Monday, January 23, 2012**, answering the questions above.

Regards,

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