

# **EXHIBIT A**

**Newman, Darth M.**

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**From:** Newman, Darth M.  
**Sent:** Friday, August 01, 2014 5:30 PM  
**To:** 'Chris Fiore'  
**Cc:** Martin, Joseph  
**Subject:** FW: Siegel - Response to Doc Request.PDF [IWOV-Archer.FID2887600]  
**Attachments:** (11321835 - 1) - Siegel Protective Order-c-c.DOC

Chris,

Here is my email related to the confidentially/protective order I said I would re-send to you. Attached is the same draft order I previously sent.

~~~Darth

**Darth M. Newman, Esq.**

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**From:** Newman, Darth M. [mailto:[dnewman@archerlaw.com](mailto:dnewman@archerlaw.com)]  
**Sent:** Thursday, July 17, 2014 5:54 PM  
**To:** 'Chris Fiore'  
**Cc:** Martin, Joseph  
**Subject:** RE: Siegel - Response to Doc Request.PDF [IWOV-Archer.FID2887600]

Hello,

The last document you sent did not address at all my client's concerns regarding confidential and personal information but did include some useful paragraphs regarding your client's forensic review of my client's data/hard drives/ etc.

I modified a protective order we used in a different EDPA case and attach it here for your review. If it is acceptable please sign and email back to me. If you make changes please use track changes.

I have 175 pages of documents ready to produce once we agree to the attached.

~~~Darth

**Darth M. Newman, Esq.**

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**From:** Chris Fiore [<mailto:cfiore@fiorebarber.com>]  
**Sent:** Monday, July 14, 2014 8:33 AM  
**To:** Newman, Darth M.  
**Subject:** Siegel - Response to Doc Request.PDF [IWOV-Archer.FID2887600]

Darth:

Here is draft of Protective order. If you make changes, kindly track changes.

Also, what is status of your responses to Plaintiff's RFP Nos. 3, 4, 5, 6, 7, 14, 15, and 16.

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**From:** Jessica Fernandez [<mailto:JFernandez@lebfirm.com>]  
**Sent:** Friday, July 11, 2014 5:41 PM  
**To:** Chris Fiore  
**Subject:** RE: Siegel - Response to Doc Request.PDF [IWOV-Archer.FID2887600]

Chris,

Attached is another protective order which we've used in our Michigan cases. It's a PO that only applies to production of the hard drives. Can you ask OC to track any changes he wants to make?

Thanks!

JF

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**From:** Chris Fiore [<mailto:cfiore@fiorebarber.com>]  
**Sent:** Tuesday, July 08, 2014 4:47 PM  
**To:** CRDiscovery; copyright  
**Subject:** FW: Siegel - Response to Doc Request.PDF [IWOV-Archer.FID2887600]

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**From:** Newman, Darth M. [<mailto:dnewman@archerlaw.com>]  
**Sent:** Tuesday, July 08, 2014 1:44 PM  
**To:** Chris Fiore  
**Cc:** Martin, Joseph  
**Subject:** RE: Siegel - Response to Doc Request.PDF [IWOV-Archer.FID2887600]

Hello Chris,

Hope you have a good 4<sup>th</sup> of July weekend. Just following up on my below email to which I have not seen a response.

~~~Darth

**Darth M. Newman, Esq.**

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**From:** Newman, Darth M.  
**Sent:** Thursday, July 03, 2014 1:21 PM  
**To:** 'Chris Fiore'  
**Cc:** Martin, Joseph  
**Subject:** RE: Siegel - Response to Doc Request.PDF [IWOV-Archer.FID2887600]

Hello Chris,

My initial reactions are the following: This looks like an agreement designed for large commercial cases between competitors. I do not think we need a 2-layer confidentiality agreement much less a 3-layer agreement. Our clients are not competitors so there should be concern about Mr. Siegel seeing any of Malibu's documents and he does not have in-house counsel in any event. Also, the draft does not address at all any of the information Malibu asked Mr. Siegel for that would be considered confidential.

Do you have a simpler or more tailored agreement we can work off, perhaps from one of Malibu's many other copyright actions, or would you prefer I take a scalpel and a pen to this one?

~~~Darth

**Darth M. Newman, Esq.**

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**From:** Chris Fiore [<mailto:cfiore@fiorebarber.com>]  
**Sent:** Tuesday, July 01, 2014 9:55 AM  
**To:** Newman, Darth M.  
**Subject:** Siegel - Response to Doc Request.PDF

Darth:

Attached is Plaintiff's standard Protective Order. I would like to get this in place so that we can review Defendant's hard drive. Kindly track changes if any are made.

CHRISTOPHER P. FIORE, ESQUIRE

 **Fiore & Barber** LLC

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