### Case 1:10-cv-00453-RMC Document 19-2 Filed 05/24/10 Page 2 of 6

# Thomas M. Dunlap

From:

Goldberg, Craig [craig.goldberg@twcable.com]

Sent:

Friday, February 26, 2010 1:29 PM

To:

Thomas M. Dunlap

Cc:

Dzujna, Christine; Keila Ujueta

Subject:

RE: Court Papers for Copyright Infringement Case

Should callers ask for a particular person or desk?

From: Thomas M. Dunlap [mailto:tdunlap@dglegal.com]

Sent: Friday, February 26, 2010 1:27 PM

To: Goldberg, Craig

Cc: Dzujna, Christine; Keila Ujueta

Subject: RE: Court Papers for Copyright Infringement Case

Craig,

Please use the 202-230-7985 phone number and <a href="mailto:subpoena@dgwlegal.com">subpoena@dgwlegal.com</a> with our Washington, DC address.

Thanks!

Tom

Best Regards,
Thomas M. Dunlap
Dunlap, Grubb & Weaver
202.316.8558 - 703.777.3885

dglegal.com

This message may be confidential or privileged. If you are not the intended recipient; any disclosure, copying, or use of the contents is prohibited. If you have received this e-mail in error, please notify us and delete the message without copying or disclosing it.

From: Goldberg, Craig [mailto:craig.goldberg@twcable.com]

Sent: Friday, February 26, 2010 11:34 AM

To: Thomas M. Dunlap

Cc: Dzujna, Christine; Keila Ujueta

Subject: RE: Court Papers for Copyright Infringement Case

Tom, what contact information should we supply in our notice letter to our customers (please see below)? We can start sending out some of the notice letters as soon as we have this info.

Craig

From: Goldberg, Craig

Sent: Thursday, February 25, 2010 2:34 PM

To: 'Thomas M. Dunlap'

Cc: Dzujna, Christine; Keila Ujueta

Subject: RE: Court Papers for Copyright Infringement Case

# Case 1:10-cv-00453-RMC Document 19-2 Filed 05/24/10 Page 3 of 6

Tom, we expect that a number of our customers will want to reach out to your clients when they receive notice from us of the subpoena. When the RIAA was in this business, it found that providing contact information to our subscribers and meaningfully responding to consumers' inquiries were very helpful as it alerted the RIAA to potential problems in suing some users (computers that had been hijacked by viruses or wireless ride alongs, unique financial situations, etc.) and it enabled the RIAA to start settlement discussions with those users that were so interested.

Do you have contact information that you would like us to pass along?

Thank you.

Craig

From: Thomas M. Dunlap [mailto:tdunlap@dglegal.com]

Sent: Wednesday, February 24, 2010 4:41 PM

To: Goldberg, Craig

Cc: Dzujna, Christine; Keila Ujueta

Subject: RE: Court Papers for Copyright Infringement Case

Craig,

As I had mentioned in our call, we are willing to work with you to make the request less burdensome and would happily agree to extend your deadline for response by informal agreement. Likewise, this agreement to extend time to respond for your business purpose of notifying your customers does not reflect our agreement that the court order requires you to do so. Please let me know how much time you need.

Best,

Tom

Best Regards, Thomas M. Dunlap Dunlap, Grubb & Weaver 202.316.8558 - 703.777.3885 dglegal.com

This message may be confidential or privileged. If you are not the intended recipient; any disclosure, copying, or use of the contents is prohibited. If you have received this e-mail in error, please notify us and delete the message without copying or disclosing it.

From: Goldberg, Craig [mailto:craig.goldberg@twcable.com]

Sent: Wednesday, February 24, 2010 4:33 PM

To: Thomas M. Dunlap

Cc: Dzujna, Christine; Keila Ujueta

Subject: RE: Court Papers for Copyright Infringement Case

Tom, thank you for the information.

This gives us until this Friday to provide notice to our customers pursuant to the terms of the Court's Order. If we cannot identify all of our customers and get the letters out by then, we will need to object to the Order.

We will give you an update on Friday.

#### Craig

From: Thomas M. Dunlap [mailto:tdunlap@dglegal.com]

Sent: Wednesday, February 24, 2010 4:30 PM

To: Goldberg, Craig

Cc: Dzujna, Christine; Keila Ujueta

Subject: RE: Court Papers for Copyright Infringement Case

Craig,

We had served subpoena on your office in Reston with my signature on the 19<sup>th</sup> of February. I sent this one from our server file as a convenience. I will e-mail the signed one to your shortly. You may confirm this with your local subpoena response team. Thanks very much for your time today.

Best,

Tom

Best Regards, Thomas M. Dunlap Dunlap, Grubb & Weaver 202.316.8558 - 703.777.3885

dglegal.com

This message may be confidential or privileged. If you are not the intended recipient; any disclosure, copying, or use of the contents is prohibited. If you have received this e-mail in error, please notify us and delete the message without copying or disclosing it.

From: Goldberg, Craig [mailto:craig.goldberg@twcable.com]

Sent: Wednesday, February 24, 2010 4:19 PM

**To:** Thomas M. Dunlap **Cc:** Dzujna, Christine

Subject: FW: Court Papers for Copyright Infringement Case

Tom, I noticed after we spoke that the G2 subpoena was not signed. Please let us know when you are planning on serving us with a signed version. Since this starts the clock for us to notify our customers and respond to the subpoena, it is an important date for us.

Thank you.

Craig

Craig Goldberg
Chief Privacy Counsel and Assistant Chief Counsel, Litigation
Time Warner Cable
60 Columbus Circle
NY, NY 10023
212-364-8466
(f): 704-973-6221

From: Thomas M. Dunlap [mailto:tdunlap@dglegal.com]

Sent: Thursday, February 18, 2010 6:15 PM

## Case 1:10-cv-00453-RMC Document 19-2 Filed 05/24/10 Page 5 of 6

**To:** Dzujna, Christine **Subject:** RE: TWC Contact

Christine,

Thanks very much for speaking with me today. I have attached our subpoenas and the court orders. I am available at 10:30 11:30 or 1:30 to 2:30 EST on the February 23. I look forward to hearing back with your proposed conference call times.

Best,

Tom

Best Regards, Thomas M. Dunlap Dunlap, Grubb & Weaver 202.316.8558 - 703.777.3885

dglegal.com

This message may be confidential or privileged. If you are not the intended recipient; any disclosure, copying, or use of the contents is prohibited. If you have received this e-mail in error, please notify us and delete the message without copying or disclosing it.

From: Dzujna, Christine [mailto:christine.dzujna@twcable.com]

Sent: Thursday, February 18, 2010 3:48 PM

**To:** Thomas M. Dunlap **Subject:** TWC Contact

Mr. Dunlap,

Here's my contact info. Please send the docs we discussed and your availability for a call next Wed (EST time).

Thank you,

Christine

Christine Dzujna
Director, Compliance and Legal Affairs
Time Warner Cable
212-364-8457 phone
704-973-6207 fax

This E-mail and any of its attachments may contain Time Warner Cable proprietary information, which is privileged, confidential, or subject to copyright belonging to Time Warner Cable. This E-mail is intended solely for the use of the individual or entity to which it is addressed. If you are not the intended recipient of this E-mail, you are hereby notified that any dissemination, distribution, copying, or action taken in relation to the contents of and attachments to this E-mail is strictly prohibited and may be unlawful. If you have received this E-mail in error, please notify the sender immediately and permanently delete the original and any copy of this E-mail and any printout.

## Case 1:10-cv-00453-RMC Document 19-2 Filed 05/24/10 Page 6 of 6

Go Green! Print this email only when necessary. Thank you for helping Time Warner Cable be environmentally responsible.

This E-mail and any of its attachments may contain Time Warner Cable proprietary information, which is privileged, confidential, or subject to copyright belonging to Time Warner Cable. This E-mail is intended solely for the use of the individual or entity to which it is addressed. If you are not the intended recipient of this E-mail, you are hereby notified that any dissemination, distribution, copying, or action taken in relation to the contents of and attachments to this E-mail is strictly prohibited and may be unlawful. If you have received this E-mail in error, please notify the sender immediately and permanently delete the original and any copy of this E-mail and any printout.

This E-mail and any of its attachments may contain Time Warner Cable proprietary information, which is privileged, confidential, or subject to copyright belonging to Time Warner Cable. This E-mail is intended solely for the use of the individual or entity to which it is addressed. If you are not the intended recipient of this E-mail, you are hereby notified that any dissemination, distribution, copying, or action taken in relation to the contents of and attachments to this E-mail is strictly prohibited and may be unlawful. If you have received this E-mail in error, please notify the sender immediately and permanently delete the original and any copy of this E-mail and any printout.

This E-mail and any of its attachments may contain Time Warner Cable proprietary information, which is privileged, confidential, or subject to copyright belonging to Time Warner Cable. This E-mail is intended solely for the use of the individual or entity to which it is addressed. If you are not the intended recipient of this E-mail, you are hereby notified that any dissemination, distribution, copying, or action taken in relation to the contents of and attachments to this E-mail is strictly prohibited and may be unlawful. If you have received this E-mail in error, please notify the sender immediately and permanently delete the original and any copy of this E-mail and any printout.

This E-mail and any of its attachments may contain Time Warner Cable proprietary information, which is privileged, confidential, or subject to copyright belonging to Time Warner Cable. This E-mail is intended solely for the use of the individual or entity to which it is addressed. If you are not the intended recipient of this E-mail, you are hereby notified that any dissemination, distribution, copying, or action taken in relation to the contents of and attachments to this E-mail is strictly prohibited and may be unlawful. If you have received this E-mail in error, please notify the sender immediately and permanently delete the original and any copy of this E-mail and any printout.