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February 8, 2016

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VIA EMAIL ONLY

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Steven A. Marenberg, Esq.
IRELL & MANELLA LLP
1800 Avenue of the Stars
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Los Angeles, CA 90067-4276

Re: Lenhoff v. UTA/ICM (Case No. CDCAL 15-cv-1086)

Dear Mr. Marenberg:

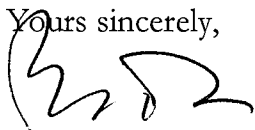
In your letter, dtd. February 5, 2016, it appears that, out of 409 TV shows, you have identified two (2) inaccuracies. Mr. Blecher and I ask that you kindly go through the entire list and advise if there are any issues with the 407 remaining shows.

In addition, for each purported inaccurate packaging or co-packaging attribution, we ask that you forward all packaging/co-packaging agreements. If you feel that confidentiality is an issue, you may forward to us a proposed stipulated protective order.

We also believe your views on the application of *Twombly* are inaccurate.

Please forward the above to us by this Wednesday.

Yours sincerely,



Philip J. Kaplan
PJK/ml

cc: Maxwell M. Blecher, Esq. (via email)