

LOEB & LOEB LLP

A LIMITED LIABILITY PARTNERSHIP
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October 29, 2002

BY HAND

Richard G. Primoff, Esq.
Sonnenschein Nath & Rosenthal
1221 Avenue of the Americas
New York, New York 10020

Re: Rowe Entertainment, Inc., et al. v. The William Morris Agency,
Inc., et al.; 98 Civ. 8272 (RPP) (JCF)

Dear Richard:

Pursuant to the Court's protocol governing e-mail production, enclosed are hard copies of the e-mails which, based on our review, we regard as non-responsive. These e-mails have been designated for "attorneys-eyes only" and cannot, under any circumstances, be reviewed by anyone other than counsel. I have also enclosed a log of the unresponsive e-mails for your convenience. Once you complete your review, it is our intention to direct your expert to delete these emails from the disk that will be delivered to you. If you disagree with our designation on a particular email, please let me know.

With respect to privileged communications, enclosed is a log of the e-mails we have designated as privileged. These e-mails will be deleted from the disk as well.

I look forward to hearing from you.

Very truly yours,



Helga Gavaris

HG:mr
05842607596
NY256784.1

NEW YORK
LOS ANGELES
NASHVILLE

Exhibit K | Exhibit L | Exhibit M

WEIL, GOTSHAL & MANGES LLP

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(212) 310-8047
rdres.barnes@weil.com

November 5, 2002

BY FACSIMILE

Richard G. Primoff, Esq.
Sonnenschein Nath & Rosenthal
1221 Avenue of the Americas
New York, New York 10020-1089

Re: Rowe Entertainment, et al. v. The William Morris Agency, et al.: 98 Civ. 8272 (RPP) (JCF)

Dear Richard:

Enclosed are two disks provided to us by EED containing the CAA emails that were restored and retrieved as a result of plaintiffs' search terms. The emails that we believe are not "material" to this litigation are contained on Disk No. 2. Pursuant to Judge Francis' Order, all emails, including those on Disk No. 1, are designated as ATTORNEY'S EYES ONLY until such time as we (plaintiffs and CAA) have identified a complete set of emails about which there is no dispute and those emails have been properly designated pursuant to the Protective Order (many of the emails contain sensitive information including credit card numbers, etc.).

Once you have reviewed the emails, please produce to us those emails which you believe are "material to the litigation." Pursuant to the Judge's Order, these emails should be produced to us in hard copy with Bates stamps. We will then re-review those emails and let you know whether we have any objections to those you believe are material so we may proceed accordingly.

All emails removed on privilege grounds have been logged on the enclosed privilege log. In addition to the privileged documents, we removed from the production on the grounds of confidentiality a series of emails from Richard Lovett's mailbox containing Mr. Lovett's dictations to his assistants of personal notes and calendar items. These emails contain highly confidential and proprietary information that has no relevance to this litigation, including information relating to CAA, Mr. Lovett's role as a movie agent, and Mr. Lovett's personal matters.

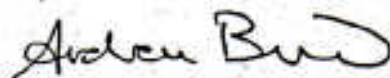
EXHIBIT K
EXHIBIT L
EXHIBIT M
EXHIBIT N

GOTSHAL & MANGES LLP
Richard G. Primoff, Esq.
November 5, 2002
Page 2

In addition, because many of the emails we are producing contain proprietary information relating to CAA and its clients, we ask that, after completion of this process, plaintiffs return to us all copies of emails which will not be a part of the final production.

This production is without waiver of our rights with respect to privilege and confidentiality, and we reserve our right to object to the admissibility of any emails on any ground.

Very truly yours,



Andrea E. Berner

WEIL, GOTSHAL & MANGES LLP

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November 12, 2002

WRITERS DIRECT LINE
(212) 310-8047
alex.berner@weil.com

VIA HAND DELIVERY

Richard G. Primoff, Esq.
Sonnenschein Nath & Rosenthal
1221 Avenue of the Americas
New York, New York 10020-1089

Re: Rowe Entertainment, et al. v. The William Morris
Agency, et al.: 98 Civ. 8272 (RPP) (JCF)

Dear Richard:

Enclosed is a disk, provided to us by EED, containing the CAA "PDF files for Mac QM users" emails that were restored and retrieved as a result of plaintiffs' search terms. We do not believe these emails are "material" to this litigation. Pursuant to Judge Francis' Order, all emails are designated as ATTORNEY'S EYES ONLY until such time as we (plaintiffs and CAA) have identified a complete set of emails about which there is no dispute and those emails have been properly designated pursuant to the Protective Order.

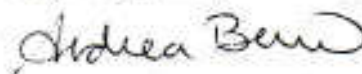
Once you have reviewed the emails, please produce to us those emails, if any, which you believe are "material to the litigation." Pursuant to the Judge's Order, these emails should be produced to us in hard copy with Bates stamps. We will then re-review those emails and let you know whether we have any objections to those you believe are material so we may proceed accordingly.

We have not removed any emails from this disk and ask that, after completion of this process, plaintiffs return to us all copies of emails which will not be a part of the final production, because many of the emails we are producing contain proprietary information relating to CAA and its clients.

WEIL, GOTSHAL & MANGES LLP
Richard G. Primoff, Esq.
November 12, 2002
Page 2

This production is without waiver of our rights with respect to privilege and confidentiality, and we reserve our right to object to the admissibility of any emails on any ground.

Very truly yours,



Andrea E. Berner

Enclosure

LOEB & LOEB LLP

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December 10, 2002

VIA FACSIMILE

Richard G. Primoff, Esq.
Sonnenschein Nath & Rosenthal
1221 Avenue of the Americas
New York, New York 10020

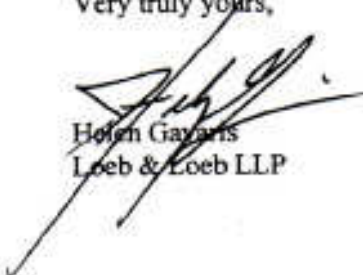
Re: Rowe Entertainment, Inc., et al. v. William Morris Agency, Inc.,
et al.; 98 Civ. 8272 (RPP)(JCF)

Dear Richard:

We received today a CD containing the Macintosh e-mails from EED, which reflects the deletions of all documents listed on our privilege and non-responsive logs. We have instructed Geoff Bogie to release this CD to you.

This production bears Bates Nos. WMA-RE 000600 1080 through WMA-RE 000600 1089.

Very truly yours,


Helen Gavaris
Loeb & Loeb LLP

HG:gpp
05842607596
NY262331.1

cc: Geoff Bogie
Geri G. Papa

NEW YORK
LOS ANGELES
NASHVILLE

Exhibit L Exhibit M

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December 4, 2002

VIA FACSIMILE

Richard G. Primoff, Esq.
Sonnenschein Nath & Rosenthal
1221 Avenue of the Americas
New York, New York 10020

Re: Rowe Entertainment, Inc., et al. v. William Morris Agency, Inc.,
et al.; 98 Civ. 8272 (RPP)(JCF)

Dear Richard:

We received today a CD containing the Lotus Notes e-mails from EED, which reflects the deletions of all documents listed on our privilege log and two non-responsive logs. We have instructed Geoff Bogie to release this CD to you.

This production bear Bates Nos. WMA-RE 000600 0001 through WMA-RE 000600 1079. However, please note that the following Bates numbers were not used by EED and, therefore, do not appear on the CD: 0132 - 0135, 0146-0149, 0945-0949, 0998-1000, 1044-1054, and 1077.

We have not heard from you with respect to the MacIntosh e-mails, hence we have not given EED any instructions. At your earliest convenience, please let us know whether we should direct EED to delete the non-responsive and privileged e-mails from the CD which contains the MacIntosh e-mails.

Very truly yours,


Helen Gavaris
Loeb & Loeb LLP

HG:ggp
05842607596
NY261008.1

cc: Geoff Bogie
Geri G. Papa

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