

Exhibit 2

From: Todd Gregorian
Sent: Wednesday, March 29, 2023 4:17 PM
To: Shipley, Michael; Thomas Robins
Cc: Michael Fletcher; Holscher, Mark C.; Gamsin, Matthew; Christopher Lavin; Bruce D. Poltrock
Subject: RE: DJ Filing [IMAN-FRBC_IMAN_LA.FID2244093]

That works, thanks

From: Shipley, Michael <mshipley@kirkland.com>
Sent: Wednesday, March 29, 2023 4:16 PM
To: Thomas Robins <trobins@frandzel.com>; Todd Gregorian <TGregorian@fenwick.com>
Cc: Michael Fletcher <mfletcher@frandzel.com>; Holscher, Mark C. <mholscher@kirkland.com>; Gamsin, Matthew <matthew.gamsin@kirkland.com>; Christopher Lavin <CLavin@fenwick.com>; Bruce D. Poltrock <bpoltrock@frandzel.com>
Subject: RE: DJ Filing [IMAN-FRBC_IMAN_LA.FID2244093]

**** EXTERNAL EMAIL ****

11 PT Ok? I can send a link.

Michael Shipley

KIRKLAND & ELLIS LLP
555 South Flower Street, Los Angeles, CA 90071
T +1 213 680 8222

michael.shipley@kirkland.com

From: Thomas Robins <trobins@frandzel.com>
Sent: Wednesday, March 29, 2023 4:14 PM
To: Todd Gregorian <TGregorian@fenwick.com>; Shipley, Michael <mshipley@kirkland.com>
Cc: Michael Fletcher <mfletcher@frandzel.com>; Holscher, Mark C. <mholscher@kirkland.com>; Gamsin, Matthew <matthew.gamsin@kirkland.com>; Christopher Lavin <CLavin@fenwick.com>; Bruce D. Poltrock <bpoltrock@frandzel.com>
Subject: RE: DJ Filing [IMAN-FRBC_IMAN_LA.FID2244093]

Count me in and let me know the call in number. Tom

Thomas Robins
FRANDZEL ROBINS BLOOM & CSATO, L.C.
1000 Wilshire Boulevard, 19th Floor
Los Angeles, CA 90017-2427
Phone: (323) 658-9703
Facsimile: (323) 651-2577
E-mail: trobins@frandzel.com
Web: [https://urldefense.com/v3/http://www.frandzel.com;!!MPAZj1r9Mghpww!GOQdb3EXCPBT R3wneJn SoS729oQ5-MJVQ3Nox-VssTUZbKbKiS-T6qLQbAuQdHJyLUtFLCyD6EF5nuyLSU\\$](https://urldefense.com/v3/http://www.frandzel.com;!!MPAZj1r9Mghpww!GOQdb3EXCPBT R3wneJn SoS729oQ5-MJVQ3Nox-VssTUZbKbKiS-T6qLQbAuQdHJyLUtFLCyD6EF5nuyLSU$)

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-----Original Message-----

From: Todd Gregorian <TGregorian@fenwick.com>

Sent: Wednesday, March 29, 2023 3:50 PM

To: Shipley, Michael <mshipley@kirkland.com>

Cc: Michael Fletcher <mfletcher@frandzel.com>; Thomas Robins <trobins@frandzel.com>; Holscher, Mark C. <mholscher@kirkland.com>; Gamsin, Matthew <matthew.gamsin@kirkland.com>; Christopher Lavin <CLavin@fenwick.com>; Bruce D. Poltrock <bpoltrock@frandzel.com>

Subject: [EXTERNAL] Re: DJ Filing

pretty flexible Before 2p

On Mar 29, 2023, at 3:45 PM, Shipley, Michael <mshipley@kirkland.com> wrote:

** EXTERNAL EMAIL **

Sure. Happy to discuss. Is there a good time tomorrow?

Michael Shipley

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michael.shipley@kirkland.com<<mailto:michael.shipley@kirkland.com>>

From: Todd Gregorian <TGregorian@fenwick.com>

Sent: Wednesday, March 29, 2023 12:43 PM

To: Shipley, Michael <mshipley@kirkland.com>

Cc: Michael Fletcher <mfletcher@frandzel.com>; Thomas Robins <trobins@frandzel.com>; Holscher, Mark C. <mholscher@kirkland.com>; Gamsin, Matthew <matthew.gamsin@kirkland.com>; Christopher Lavin <CLavin@fenwick.com>; Bruce D. Poltrock <bpoltrock@frandzel.com>

Subject: RE: DJ Filing

Michael, Thanks very much for your courtesy. As of today, Amazon not yet decided whether or how to assert a veil piercing theory. I would attempt a joke about lack of DJ jurisdiction at this point, but I don't want to convey the wrong message. Michael,

Thanks very much for your courtesy. As of today, Amazon not yet decided whether or how to assert a veil piercing theory. I would attempt a joke about lack of DJ jurisdiction at this point, but I don't want to convey the wrong message. I would be happy to speak with you about this candidly, in the interest of potentially saving everyone including the courts the time and expense of procedural wrangling.

-t

From: Shipley, Michael <mshipley@kirkland.com<<mailto:mshipley@kirkland.com>>>

Sent: Wednesday, March 29, 2023 11:03 AM

To: Christopher Lavin <CLavin@fenwick.com<<mailto:CLavin@fenwick.com>>>; Todd Gregorian <TGregorian@fenwick.com<<mailto:TGregorian@fenwick.com>>>; Bruce D. Poltrock <bpoltrock@frandzel.com<<mailto:bpoltrock@frandzel.com>>>
Cc: Michael Fletcher <mfletcher@frandzel.com<<mailto:mfletcher@frandzel.com>>>; Thomas Robins <trobins@frandzel.com<<mailto:trobins@frandzel.com>>>; Holscher, Mark C. <mholscher@kirkland.com<<mailto:mholscher@kirkland.com>>>; Gamsin, Matthew <matthew.gamsin@kirkland.com<<mailto:matthew.gamsin@kirkland.com>>>
Subject: RE: DJ Filing

** EXTERNAL EMAIL **

Chris-

The plaintiffs in the DJ action will stipulate to the extension of time to respond until 4/13.

As a courtesy, can you let us know if Amazon plans to file a cross-claim in the DJ case, to assert an alter ego theory in the federal case to which the Secured Creditors are not currently parties, or both?

Thanks,

Mike

Michael Shipley

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555 South Flower Street, Los Angeles, CA 90071 T +1 213 680 8222

michael.shipley@kirkland.com<<mailto:michael.shipley@kirkland.com>>

From: Christopher Lavin <CLavin@fenwick.com<<mailto:CLavin@fenwick.com>>>
Sent: Tuesday, March 28, 2023 12:55 PM
To: Todd Gregorian <TGregorian@fenwick.com<<mailto:TGregorian@fenwick.com>>>; Shipley, Michael <mshipley@kirkland.com<<mailto:mshipley@kirkland.com>>>; Bruce D. Poltrock <bpoltrock@frandzel.com<<mailto:bpoltrock@frandzel.com>>>
Cc: Michael Fletcher <mfletcher@frandzel.com<<mailto:mfletcher@frandzel.com>>>; Thomas Robins <trobins@frandzel.com<<mailto:trobins@frandzel.com>>>; Holscher, Mark C. <mholscher@kirkland.com<<mailto:mholscher@kirkland.com>>>; Gamsin, Matthew <matthew.gamsin@kirkland.com<<mailto:matthew.gamsin@kirkland.com>>>
Subject: RE: DJ Filing

Counsel, On March 1, the PersonalWeb investors requested Fenwick accept service of the declaratory judgment complaint, which after an opportunity to speak with our client, we agreed to accept service on March 8. We have discovered that in the

Counsel,

On March 1, the PersonalWeb investors requested Fenwick accept service of the declaratory judgment complaint, which after an opportunity to speak with our client, we agreed to accept service on March 8. We have discovered that in the interim the investors attempted to serve Amazon's registered agent on March 1.

For clarity and out of an abundance of caution, please confirm that you will stipulate to move the deadline to answer or otherwise respond to the complaint to Thu., Apr. 13, under Cal. Rules of Court, rule 3.110(d).

Regards,
Chris

Fenwick | Associate | +1 415-875-2287 | CLavin@fenwick.com | Admitted to practice in California.

From: Todd Gregorian <TGregorian@fenwick.com>>
Sent: Wednesday, March 8, 2023 11:50 AM
To: Shipley, Michael <mshipley@kirkland.com>>; Christopher Lavin <CLavin@fenwick.com>>; Bruce D. Poltrock <bpoltrock@frandzel.com>>
Cc: Michael Fletcher <mfletcher@frandzel.com>>; Thomas Robins <trobins@frandzel.com>>; Holscher, Mark C. <mholscher@kirkland.com>>; Gamsin, Matthew <matthew.gamsin@kirkland.com>>
Subject: RE: DJ Filing

Sounds fine to me. Thanks

From: Shipley, Michael <mshipley@kirkland.com>>
Sent: Wednesday, March 8, 2023 11:48 AM
To: Todd Gregorian <TGregorian@fenwick.com>>; Christopher Lavin <CLavin@fenwick.com>>; Bruce D. Poltrock <bpoltrock@frandzel.com>>
Cc: Michael Fletcher <mfletcher@frandzel.com>>; Thomas Robins <trobins@frandzel.com>>; Holscher, Mark C. <mholscher@kirkland.com>>; Gamsin, Matthew <matthew.gamsin@kirkland.com>>
Subject: RE: DJ Filing

** EXTERNAL EMAIL **

Todd-

Although we don't oppose consolidation in principle, it's premature because under LA Superior Court's local rules, cases can't be consolidated until they are in the same department. So we need to wait until Judge Salkin acts on the notice of related case, which I'm guessing might not happen till she's back in town next week. If we don't get any movement on that by mid/late next week, I can have someone call the clerk and check the status.

Thanks,

Mike

Michael Shipley

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555 South Flower Street, Los Angeles, CA 90071 T +1 213 680 8222

michael.shipley@kirkland.com

From: Todd Gregorian <TGregorian@fenwick.com>>
Sent: Wednesday, March 8, 2023 9:04 AM
To: Shipley, Michael <mshipley@kirkland.com>>; Christopher Lavin <CLavin@fenwick.com>>; Bruce D. Poltrock <bpoltrock@frandzel.com>>
Cc: Michael Fletcher <mfletcher@frandzel.com>>; Thomas Robins <trobins@frandzel.com>>; Holscher, Mark C. <mholscher@kirkland.com>>; Gamsin, Matthew <matthew.gamsin@kirkland.com>>

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