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January 19, 2016

Via ECF

The Honorable Michael A. Hammer, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

**Re: WAG Acquisitions L.L.C. v. Sobonito Investments. Ltd., et al. (14-cv-01661);
WAG Acquisitions L.L.C. v. MultiMedia, LLC, et al. (14-cv-02340);
WAG Acquisitions L.L.C. v. WMM LLC, et al. (14-cv-02345);
WAG Acquisitions L.L.C. v. Flying Crocodile, et al., (14-cv-02674);
WAG Acquisitions L.L.C. v. Gattyan Group S.a.r.l et al. (14-cv-02832);
WAG Acquisitions L.L.C. v. FriendFinder Networks Inc., et al. (14-cv-03456);
WAG Acquisitions L.L.C. v. Vubeology, Inc., et al. (14-cv-04531); and
WAG Acquisitions L.L.C. v. WebPower, Inc., et al. (15-cv-03581)**

Dear Judge Hammer,

On behalf of Plaintiff WAG Acquisition, L.L.C. (“WAG”) and the Defendants in the above-captioned cases (“Defendants”) (collectively, “the Parties”), we write regarding the Court’s Letter Orders (*e.g.*, D.I. 66 in 14-cv-02340).

The parties have met and conferred to prepare the required submissions for the January 22 Rule 16 conference, namely: the Joint Discovery Plan; E-Discovery Order; and 502(d) Order. The Parties are filing these documents with the Court today.¹

Where the Parties were unable to reach agreement in the Joint Discovery Plan, we have included competing proposals, respectively titled “Plaintiff’s Position” and “Defendants’ Position.” The Parties have no disagreements concerning the E-Discovery and 502(d) Orders.

We appreciate the Court’s courtesies and consideration. We look forward to meeting with the Court on January 22, 2016 at 11:00 AM, during which the Parties will be ready to address the foregoing and any other matters Your Honor may have.

Respectfully,

s/ Justin T. Quinn
Justin T. Quinn

cc: All counsel of record (*via* ECF)

¹ The Parties will continue to meet and confer on a Confidentiality Order to submit to the Court.