

December 30, 2021

VIA EMAIL

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RE: *Bright Data Ltd. v. NetNut Ltd.*, Case No. 2:21-CV-0225-JRG-RSP (E.D. Tex.)

Dear Counsel:

We write regarding the scheduling of depositions. Bright Data plans to notice the depositions of the NetNut employees listed below for the third and fourth weeks of February 2022 (February 14-25). This schedule assumes NetNut has produced its documents and email in accordance with the Docket Control order and E-Discovery Order.

Please confirm the availability of the individuals listed below for deposition during those two weeks. The list below is subject to revision based on additional discovery including the review of NetNut's email production. Bright Data also intends to notice the 30(b)(6) deposition of NetNut for the second and third weeks of February. To the extent any of the individuals below will be 30(b)(6) witnesses for NetNut, Bright Data agrees that the 30(b)(1) deposition of that individual will be conducted in conjunction with the 30(b)(6) deposition.

- Barak Avitbul
- Moishi Kramer
- Tomer Cohen
- Ezra Muallem
- Dor Cohen
- Alan Abramoff
- Jeffy Binhas

In view of the recent COVID upsurge and the associated travel restrictions, particularly with Israel and the United States, Bright Data proposes that the parties conduct all depositions during the fact and expert discovery period via remote means as the parties did in the prior litigation.

Please let us know by January 7, 2022, the availability of NetNut's witnesses for the second and third weeks of February, and if NetNut concurs with conducting all depositions during fact and expert discovery remotely.

Sincerely,



J. Michael Woods

Counsel for Plaintiff Bright Data Ltd.