
From: John Gutkoski <john.gutkoski@pierferd.com>
Sent: Monday, July 15, 2024 5:56 PM
To: Rachuba, L Roman; Farnan@rlf.com
Cc: blau@rlf.com; _Topia; Ryan Beard; Armon Shahdadi; Carl Neff; Stefanie Allinson
Subject: RE: Topia Technology, Inc. v. Egnyte, Inc. - Outstanding Discovery Issues
Attachments: Egnyte's Amended ROG Answers 7-15-2024.pdf; EGNYTE_058962-EGNYTE_058970.pdf; Egnyte's Supplemental Priv Log 7-15-24.pdf

Roman,

Egnyte responds to your July 10, 2024 email as follows:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

With respect to the Court's Orders last Monday concerning Egnyte's limited representation by Attorney Keefe, Egnyte has confirmed that only two email chains of correspondence fall within the Court's Orders. While both were previously noted in a produced privilege log to Topia in this case, Egnyte relogs them in the attached Supplemental Privilege Log. Egnyte has further confirmed that Attorney Keefe's limited services were performed pursuant to Egnyte's long standing retention agreement with the Cooley firm, a copy of which is produced here (Egnyte_058962-70) preserving all applicable privileges. No separate retention agreement was entered into in regard to Topia's patents or this case.

[REDACTED]

Sincerely,

John T. Gutkoski