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April 30, 2015

By ECF without enclosures and Hand Delivery

Hon. Denise L. Cote
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Court House
500 Pearl Street
New York, New York 10007-1312

Re: DNAML PTY, Limited v. Apple, Inc., et al., 13 Civ. 6516 (DLC)
Diesel eBooks, LLC v. Apple, Inc., et al., 14 Civ. 1768 (DLC)
Abbey House Media, Inc. v. Apple, Inc., et al., 14 Civ. 2000 (DLC)

Dear Judge Cote,

This Firm represents Hachette Group Books, Inc. in the above-referenced matters. We write pursuant to Paragraph 20 of the Stipulated Protective Order with proposed redactions to Defendants' letter dated April 27, 2015. DNAML's counsel has agreed to this proposal.

We propose that (1) the highlighted portions of the enclosed letter and appendix be redacted before filing via the ECF system and (2) the DNAML-produced documents, all of which have designations of Highly Confidential, and Exhibits 2-4, which compare Highly Confidential DNAML-produced documents, be filed under seal in lieu of filing these documents on CDROM in the traditional manner as previously requested. We propose that all other materials – i.e., the Declaration of J. Christopher Racich and Exhibit 1 (Mr. Racich's CV) – be filed unredacted.

The Freshfields Bruckhaus Deringer US LLP partners include members of the Bars of the State of New York and the District of Columbia, Solicitors of the Supreme Court of England and Wales and Rechtsanwälte of Germany

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212

Respectfully Submitted,

/s/ Richard Snyder
Richard Snyder

Counsel

(Enclosure)