

STATE OF MISSISSIPPI



JIM HOOD
ATTORNEY GENERAL

January 15, 2015

Mike Masnick
Techdirt.com
MuckRock News
DEPT MR 15537
Post Office Box 55819
Boston, Massachusetts 02205-5819
15537-33947427@requests.muckrock.com

Dear Mr. Masnick:

The Attorney General's Office is in receipt of your public records request dated January 9, 2015, and received by the Opinions Division on January 12, 2015. The Attorney General is currently involved in litigation with Google, Inc., over an investigation of Google by the Attorney General's Office under the Mississippi Consumer Protection Act. The documents sought in your request are the subject of the pending investigation and litigation, and are some of the same documents sought by Google via a public records request and a discovery request to this office. It is the position of this office that Google's request for the documents in question violates an "Order on Agreed Stay, Briefing Schedule and Preliminary Injunction Hearing" issued by the district court in the pending litigation. As a result, this office denied Google's public records request. Copies of the correspondence between this office and counsel for Google, and of the district court's order are attached here.

In addition, this office has now filed its motion to dismiss Google's complaint based on lack of subject matter jurisdiction and other grounds, a copy of which is attached. Rule 16(b)(3)(A) of the Local Uniform Civil Rules of the United States District Courts for the Northern District of Mississippi and the Southern District of Mississippi provides that filing a motion asserting a jurisdictional defense stays discovery. Therefore, discovery is stayed, to the extent that it was not already stayed by the district court's previous order.

In light of the stay, and the potential impact on this office's pending investigation and litigation, please confirm in writing that neither you, nor Techdirt.com, nor MuckRock News is affiliated with or acting on behalf of Google, Inc., in the issuance of your public records request. Once we receive such confirmation, we will process your request per the Public Records Act and office policies.

In the meantime, we will continue analyzing your request and estimating the costs necessary to conduct a search for the requested documents, and to review those documents to determine if they fall under the definition of "public records" as defined by Miss. Code Ann. § 25-61-3(b), and if they are otherwise exempt from the Public Records Act.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mary Jo Woods", with a long horizontal flourish extending to the right.

Mary Jo Woods
Special Assistant Attorney General

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

Google, Inc.)
<i>Plaintiff</i>)
)
v.)
) No. 3:14cv981 HTW-LRA
)
)
Jim Hood, Attorney General of the) ORDER ON AGREED STAY,
State of Mississippi, in his official) BRIEFING SCHEDULE AND
capacity) PRELIMINARY INJUNCTION
<i>Defendant</i>) HEARING
)

Upon consideration of Plaintiff Google Inc.'s Motion, and the arguments, agreements and representations of the parties, the Court orders as follows:

WHEREAS Plaintiff Google Inc. filed suit on December 19, 2014 against the Defendant, Jim Hood, Attorney General for the State of Mississippi, in his official capacity;

WHEREAS Plaintiff Google Inc. moved on December 19, 2014 for a temporary restraining order and a preliminary injunction on the ground that it faced irreparable harm if the Defendant either (a) enforced the Administrative Subpoena and Subpoena Duces Tecum issued by the Defendant and served on Plaintiff on October 27, 2014 (the "Subpoena"); or (b) brought a civil or criminal charge against Plaintiff (or any subsidiary thereof) under Mississippi law. Plaintiff submitted in support of its motion a memorandum of law and four declarations, along with sixty-one exhibits;

WHEREAS on December 19, 2014, the Court scheduled a hearing on the Plaintiff's motion for a temporary restraining order for December 22, 2014 at 4 p.m.;

WHEREAS the parties congregated in the courtroom of the undersigned on December 22, 2014, for a hearing on this matter.

WHEREAS the Court had the benefit of a brief of case authorities and facts submitted by the Plaintiff, but no brief of case authorities and facts submitted by the Defendant owing to the short time Defendant had to submit such between the time of Plaintiff's request for a temporary restraining order and the date of the hearing, although the Defendant announced the Defendant's readiness to proceed to oral argument.

WHEREAS this Court desired a written submission from Defendant and oral arguments by the parties thereafter, this Court sought an agreement between the parties on a proper course of action.

WHEREAS the Parties represented to the Court at the hearing on December 22, 2014, that the Parties agreed to a stay of this case and to maintain the status quo until March 6, 2015;

WHEREAS the Defendant represented to the Court that the deadline for Google to respond to the "Administrative Subpoena and Subpoena Duces Tecum" issued on October 21, 2014 is extended until March 6, 2015, a representation Defendant first had offered to Plaintiff in a letter dated December 22, 2014. Defendant at the hearing also agreed that during the period of the stay, the Defendant would not bring civil or criminal charges against Plaintiff (or any

subsidiary thereof), a modification of Defendant's earlier position that Defendant had no "present" intention to bring a civil or criminal charge against Plaintiff under Mississippi law for making accessible third-party content to Internet users.

WHEREAS the Plaintiff accepted these representations of the Defendant and agreed to a stay of the case and to maintain the status quo until March 6, 2015, as set forth herein;

WHEREAS based on the representations and agreement of the Plaintiff and the Defendant, the Court did not conduct a hearing on the merits of the Plaintiff's motion for temporary restraining order;

WHEREAS the Court accepted the representations and agreement of the Plaintiff and Defendant as set forth herein during the December 22, 2014, hearing;

It is hereby:

ORDERED that, based on the representations and agreement of the Plaintiff and the Defendant, this case is stayed and the status quo shall be maintained until March 6, 2015, during which time the Defendant has agreed not to enforce the Administrative Subpoena and Subpoena Duces Tecum or bring civil or criminal charges against the Plaintiff ;

ORDERED that the hearing on the Plaintiff's motion for a preliminary injunction shall be held at 9:30 a.m. on Friday, February 13, 2015, and, if necessary, at 9:30 a.m. on Saturday, February 14, 2015;

ORDERED that the Defendant's brief in opposition to the Plaintiff's motion for preliminary injunction, including any motions to dismiss on jurisdictional

grounds, shall be filed by January 12, 2015, and that the Plaintiff's reply brief shall be filed by January 22, 2015;

ORDERED that this Order shall be filed with the clerk's office and entered into the record in this matter.

IT IS SO ORDERED

DATED: December 23, 2014

s/ HENRY T. WINGATE
UNITED STATES DISTRICT JUDGE

RECEIVED
DEC 23 2014

Section 8.0.1

ATTORNEY GENERAL'S OFFICE
OPINIONS DIVISION

**OFFICE OF THE ATTORNEY GENERAL
REQUEST FOR PUBLIC RECORDS**

Person Requesting: Fred Krutz, Forman Perry Watkins Krutz & Tardy, LLP

Representing: Google Inc.

Street/Mailing Address: P.O. Box 22608

City, State, Zip: Jackson, MS 39225

Telephone: 601-960-8622 Date of Request: December 19, 2014

Material Requested (Please be as clear and concise as possible.):

(1) During the period from January 1, 2012 through the present, all information and documents that have been exchanged between Attorney General Jim Hood, the Office of the Attorney General, and/or any employee of the Office of the Attorney General on the one hand and any of the following third parties on the other: the Motion Picture Association of America or any of its members, Steven Fabrizio, Vans Stevenson, Kate Bedingfield, the Recording Industry Association of America or any of its members, Digital Citizens Alliance or any of its members, the Pharmaceutical Research and Manufacturers of America or any of its members, Thomas Galvin, FairSearch.org or any of its members, Microsoft Corporation, Patrick Lynch Group, Lynch and Pine Attorneys at Law, Orrick Herrington & Sutcliffe LLP, Jenner & Block LLP, Thomas J. Perrelli, Elizabeth Bullock, the Mike Moore Law Firm, former Mississippi Attorney General Michael Moore, 21st Century Fox, News Corp., Comcast Corporation, Viacom Inc., Warner Bros. Entertainment Inc., The Walt Disney Company, Sony Pictures Entertainment Inc. NBCUniversal, Inc., and/or any agents, partners, associates, employees, staffers, affiliates, or predecessors of the foregoing. For the avoidance of doubt, this request includes all communications of any form, including email, text messages, and any other form of communication from official or personal accounts or addresses of Attorney General Jim Hood, the Office of the Attorney General, and or any employee of the Office of the Attorney General.

(2) During the period from January 1, 2012 through the present, identify with specificity any gifts or other support, including in kind, accepted by Attorney General Jim Hood in his personal, official, and candidate capacity from any of the following third parties: the Motion Picture Association of America or any of its members, Steven Fabrizio, Vans Stevenson, Kate Bedingfield, the Recording Industry Association of America or any of its members, Digital Citizens Alliance or any of its members, the Pharmaceutical Research and Manufacturers of America or any of its members, Thomas Galvin, FairSearch.org or any of its members, Microsoft Corporation, the Patrick Lynch Group, Lynch and Pine Attorneys at Law, Orrick Herrington & Sutcliffe LLP, Jenner & Block LLP, Thomas J. Perrelli, Elizabeth Bullock, the Mike Moore Law Firm, former Mississippi Attorney General Michael Moore, 21st Century Fox, News Corp.,

Comcast Corporation, Viacom Inc., Warner Bros. Entertainment Inc., The Walt Disney Company, Sony Pictures Entertainment Inc. NBCUniversal, Inc., and/or any agents, partners, associates, employees, staffers, affiliates, or predecessors of the foregoing.

(3) The total dollar amount of attorney's fees and expenses paid by the Office of the Attorney General and/or Attorney General Jim Hood to any attorney, law firm, and/or agent of an attorney or law firm that is not employed by the Office of the Attorney General, in connection with any inquiry by the Office of the Attorney General and/or Attorney General Jim Hood that relates to any discussion of or matter involving Google Inc., or its alleged conduct.

(4) Any and all agreements between the Office of the Attorney General and/or Attorney General Jim Hood with any attorney, law firm, and/or agent of an attorney or law firm that is not employed by the Office of the Attorney General, in connection with any inquiry by the Office of the Attorney General and/or Attorney General Jim Hood that relates to any discussion of or matter involving Google Inc., or its alleged conduct.

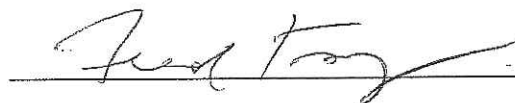
(5) During the period from January 1, 2012 to the present, all information and documents that relate to or concern Google Inc., Project Goliath, and/or Project Keystone, to the extent not covered by the above requests. For the avoidance of doubt, this request includes all communications of any form, including email, text messages, and any other form of communication from official or personal accounts or addresses of Attorney General Jim Hood, the Office of the Attorney General, and or any employee of the Office of the Attorney General.

(6) Any and all information and documents provided by the Office of the Attorney General in response to the request for public records referenced in the article published on the *New York Times* website on December 16, 2014 as "Google's Detractors Take Their Fight to the States," and in the print version of the *New York Times* on December 17, 2014 as "Google's Critics Enlist States in Their Fights."

Review Requested: _____ Personally Inspect _____ Copy of Material

Further Instructions: All copied materials should be provided in their original format, *i.e.* materials maintained in hard copy format should be provided in that format, and materials maintained in electronic format should be provided in their native electronic format (or in a common electronic format if the native format can only be accessed by sensitive or proprietary software) on a CD, DVD, or other appropriate media.

Requestor's Signature: _____



Please submit this request to:

Opinions Division
Office of the Attorney General
P.O. Box 220
Jackson, Mississippi 39205

Note: Actual costs of gathering and reproducing requested materials will be the responsibility of the requesting agent.

STATE OF MISSISSIPPI



JIM HOOD
ATTORNEY GENERAL

CONSUMER PROTECTION
DIVISION

January 6, 2015

Fred Krutz
Forman Perry Watkins Krutz & Tardy, LLP
City Centre, Suite 100
200 South Lamar Street
Jackson, Mississippi 39201-4099

RE: Google Public Records Request

Dear Mr. Krutz:

The Attorney General's Office is in receipt of your request dated December 19, 2014, and received on December 23, 2014. It is the position of this Office that your request violates the "Order On Agreed Stay, Briefing Schedule and Preliminary Injunction Hearing," issued by Judge Wingate on December 23, 2014. As you know, Judge Wingate's order mandates a stay on proceedings between Google and the Attorney General's office and maintains the status quo until March 6, 2015.

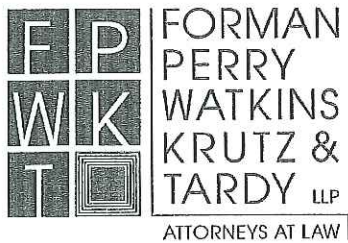
Moreover, all documents responsive to your request either do not exist, do not fall under the definition of "public records" as defined by 25-61-3(b) or constitute investigative reports pursuant to Miss. Code Ann. Section 25-61-3(f), attorney work product pursuant to Miss. Code Ann. Section 25-1-102, and/or attorney-client communications pursuant to Miss. Code Ann. Section 25-61-11. Thus, we regret to inform you that said documents are exempt from public inspection.

If you have any questions regarding this matter, I may be contacted at 601-359-4279.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bridgette W. Wiggins".

Bridgette W. Wiggins
Special Assistant Attorney General



FRED KRUTZ
Direct Dial: (601) 960-8622
fred@fpwk.com

City Centre, Suite 100
200 South Lamar Street
Jackson, Mississippi 39201-4099

Post Office Box 22608
Jackson, Mississippi 39225-2608

Telephone: 601.960.8600
Main Facsimile: 601.960.8613
Asbestos Facsimile: 601.960.3241

www.fpwkt.com

January 14, 2015

VIA EMAIL AND REGULAR MAIL

Bridgette W. Wiggins
Special Assistant Attorney General
550 High Street
Post Office Box 22947
Jackson, Mississippi 39225-2947

Re: Google Inc.'s Mississippi Public Records Act Request

Dear Bridgette:

This responds to your January 6, 2015 letter declining to produce any documents in response to Google Inc.'s December 19, 2014 Mississippi Public Records Act request to the Mississippi Attorney General.

You suggest that Judge Wingate's December 23 order – which granted Google the relief sought in its TRO motion – somehow also excused the Attorney General from having to comply with the pending MPRA request, even though you never brought that request to Judge Wingate's attention or sought *any* form of relief from him. Your position is mistaken. The operative paragraph of the Order provides as follows:

[T]his case is stayed and the status quo shall be maintained until March 6, 2015, during which time the Defendant has agreed not to enforce the Administrative Subpoena and Subpoena Duces Tecum or bring civil or criminal charges against the Plaintiff.

The Order does not purport to address, much less preclude Google from seeking to enforce, its pending MPRA request, an entirely separate exercise. Nor does the Order relieve the Attorney General of its statutory obligation to produce public records under the MPRA.

Judge Wingate's on-the-record description of his Order during the December 22, 2014 hearing (transcript at 32) confirms the narrow scope of relief ordered, and that Judge Wingate's Order does not reach Google's MPRA request:

THE COURT: So then there will be a stay of any requirement of Google to answer the subpoena or submit documents any further relative to the subpoena, a stay with regard to any civil or criminal enforcement provision. And, meanwhile, the briefing schedule that I set out will be in effect.

MR. MIRACLE: Yes, Your Honor.

THE COURT: And a sunset provision will be March 6th.

MR. MIRACLE: Yes, Your Honor.

THE COURT: Okay. I'm fine with that. You all fine with that?

MR. KRUTZ: Yes, sir, we are. I think counsel – and we think it's a good idea.

In short, the Attorney General's attempt to turn Judge Wingate's order – squarely addressed to the relief Google sought in its TRO motion – into an order granting the Attorney General relief it did not and could not seek, a general bar on Google pursuing information to which it is entitled under the MPRA, is untenable.

Equally implausible is your alternative basis for withholding documents – that every document covered by the request is protected by either by the attorney client privilege, the work product doctrine, or the investigative reports exemption. Google's MPRA request seeks communications between the Attorney General and third parties or their representatives, who were seeking to influence the Attorney General in his dealings with Google. The Attorney General's communications with third parties seeking to influence his conduct are at the very core of what the MPRA requires be subject to public scrutiny, and cannot possibly be privileged, work product, or investigative reports. Indeed, the Attorney General has already acknowledged that such communications must be made public in response to MPRA requests. For example, the New York Times on October 28, 2014 posted on its website various documents it obtained through public record requests, including a February 20, 2014 email to the Attorney General from the lobbyist Mike Moore, regarding a "pre meeting on Google." See http://www.nytimes.com/interactive/2014/10/28/us/5-Rhode-Island-Attorney-General-Turned-Attorney-General-Lobbyist.html?_r=1 (last visited December 15, 2014). Such communications with lobbyists, trade associations, and lawyers seeking to influence the Attorney General are not exempt from disclosure, and must be produced.

Leaving aside the merit of your claims, your letter does not identify the documents which are responsive to Google's MPRA request, or the nature or the basis of the claims of privilege or exemption with respect to each of those documents. Certainly, one-size-fits-all objections are not sufficient.

In sum, your January 6, 2015 letter does not respond to Google's MPRA request in good faith or in compliance with law.

Unless you produce the requested documents, Google will seek appropriate relief.

Finally, to avoid the duplicative formality of serving you with a separate request, please treat the following subset of the materials sought in the MPRA request as also having been requested pursuant to Federal Rule of Civil Procedure 34(a) in the matter before Judge Wingate:

1. Any drafts of possible subpoenas, subpoenas duces tecum, or civil investigative demands (“CIDs”) to Google provided directly or indirectly to the Office of the Mississippi AG (the “OMAG”) by any of the third parties identified in item 1 of the MPRA request (the “third parties”), as referenced in <http://arstechnica.com/tech-policy/2014/12/how-hollywood-spurned-by-congress-pressures-states-to-attack-google/> (“How Hollywood Pressures States”) (quoting email from Jenner & Block’s Tom Perrelli proposing that “some subset of AGs (3-5, but Hood alone if necessary) should move towards issuing CIDs . . . in terms of outreach and action by us, I think we should (a) Shore up Hood and try to get a small group . . . focused on a clear timetable for CIDs, (b) Draft the CIDs”)
2. Any research provided directly or indirectly to the OMAG by any of the third parties regarding possible litigation against Google, as referenced in How Hollywood Pressures States (Perrelli: “we should . . . research state law to determine the best state to pursue litigation and communicate that to Hood so that he can try to get the right AGs on board”).
3. The November 13, 2013 email from General Hood to Van Stevenson of the MPAA, referenced in How Hollywood Pressures States, in which General Hood discussed an upcoming meeting with “MPAA/RIAA outside counsel Tom Perrelli and others” to “discuss the next move,” and any replies or responses thereto.
4. The August 28, 2014 letter referenced in How Hollywood Pressures States from the OMAG “to AGs in all 50 states” regarding “setting up a working group” related to the OMAG’s planned subpoena or CID to Google, and any communication between the OMAG and the third parties reflecting, relating, or referring to the August 28, 2014 letter.
5. Any communications from OMAG to any of the third parties providing advance notice of the intent to issue a subpoena, subpoena duces tecum or CID to Google, as referenced in How Hollywood Pressures States (MPAA GC Fabrizio: “Mississippi AG Hood is expected to issue a CID to Google sometime this week (*that information is naturally very confidential*)”).
6. Any communications from any of the individuals or entities identified in the MPRA request attaching or otherwise referencing the word files titled “Google can take action” “Google must change its behavior” “Google illegal conduct” and/or “CDA”, as well as the word files themselves, as referenced in How Hollywood Pressures States (Jenner & Block’s Perrelli indicating that he will send four “white papers” with these names to Connecticut’s Attorney General).
7. Any drafts of any letters to Google provided directly or indirectly to the OMAG by any of the third parties, and any communications with any of the third parties reflecting, referring, or relating to such draft letters.

To insure the availability of these materials in time for use in the briefing and argument on the preliminary injunction hearing, we ask that you agree to produce this specifically identified subset of the requested materials by no later than January 19, 2015. Given the tight schedule, we ask that you stipulate pursuant to Rule 26(d)(1) that these focused requests go forward without awaiting a formal discovery conference pursuant to Rule 26(f).

Sincerely,

Forman Perry Watkins Krutz & Tardy LLP



Fred Krutz

FK/mkm

cc: Doug Miracle (via Electronic Mail)

IN THE UNITED STATES DISTRICT COURT
 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
 NORTHERN DIVISION

Google, Inc.)	
<i>Plaintiff</i>)	
)	
v.)	
)	No. 3:14-cv-981-HTW-LRA
)	
Jim Hood, Attorney General of the State of Mississippi, in his official capacity)	
<i>Defendant</i>)	
)	

**ATTORNEY GENERAL JIM HOOD’S MOTION TO DISMISS COMPLAINT BASED
 ON JURISDICTION AND OTHER GROUNDS**

COMES NOW Jim Hood, Attorney General for the State of Mississippi in his official capacity (hereafter the “Attorney General” or “General Hood”), and files his motion to dismiss Google, Inc.’s (“Google”) Complaint for Declaratory and Injunctive Relief pursuant to FRCP 12(b)(1) and 12(b)(6) and states:

1. Google filed suit against the Attorney General seeking declaratory and injunctive relief stemming from General Hood’s investigation of Google under the Mississippi Consumer Protection Act, Miss. Code Ann. § 75-24-1, *et seq.* (“MCPA”), Complaint, Docket No. 1.
2. Google seeks a declaration that the Attorney General’s on-going state-law investigation: (1) violates 47 U.S.C. § 230 of the Communications Decency Act (“CDA”); (2) violates Google’s First and Fourteenth Amendment rights under the United States Constitution; (3) violates Google’s Fourth and Fourteenth Amendment rights; and (4) is preempted under the Copyright Act, 17 U.S.C. §§ 301, 512, and the Food, Drug, and Cosmetic Act (“FDCA”), 21

U.S.C. § 337 (“FDCA”), and 42 U.S.C. § 1983. Complaint, pp. 28-32. Google claims this case presents a federal question under Article III and 28 U.S.C. §§ 1331 and 1343(a)(3). Complaint, ¶

6. Google seeks remedies under 28 U.S.C. § 2201 and 2202, and 42 U.S.C. §§ 1983 and 1988.

Id.

3. Google’s declaratory judgment action should be dismissed for lack of subject matter jurisdiction. Google has not stated claims arising under 28 U.S.C. § 1331 but has asserted defenses to anticipated but not filed state law claims. As such, jurisdiction is lacking under Section 1331.

4. Google has also failed to establish subject matter jurisdiction pursuant to 28 U.S.C. § 1343(a)(3) as it has failed to state a claim against the Attorney General under 42 U.S.C. § 1983.

5. Alternatively, the case should be dismissed under the *Younger* abstention doctrine, set forth in *Younger v. Harris*, 401 U.S. 37 (1971), and its progeny.

6. Finally, the case should be dismissed because Google’s claims are not ripe for adjudication. *See Reno Catholic Social Services, Inc.*, 509 U.S. 43 (1993).

7. In further support of the motion to dismiss, the Attorney General relies on the following:

- A. Administrative Subpoena and Subpoena Duces Tecum [EXHIBIT A];
- B. Memorandum in Support of Motion to Dismiss Complaint Based on Jurisdiction and Other Grounds, filed separately.

This the 12th day of January, 2015.

Respectfully Submitted,

JIM HOOD, ATTORNEY GENERAL STATE OF MISSISSIPPI, in his official capacity

By: JIM HOOD, ATTORNY GENERAL, STATE OF MISSISSIPPI
By: /s/ Douglas T. Miracle
DOUGLAS T. MIRACLE, MSB # 9648
SPECIAL ASSISTANT ATTORNEY GENERAL

OFFICE OF THE ATTORNEY GENERAL
CIVIL LITIGATION DIVISION
Post Office Box 220
Jackson, Mississippi 39205-0220
Telephone: (601) 359-5654
Facsimile: (601) 359-2003
dmira@ago.state.ms.us

CERTIFICATE OF SERVICE

I, Douglas T. Miracle, Special Assistant Attorney General for the State of Mississippi, do hereby certify that on this date I electronically filed the foregoing document with the Clerk of this Court using the ECF system and sent a true and correct copy to counsel record:

Daniel J. Mulholland
FORMAN, PERRY, WATKINS, KRUTZ & TARDY, LLP - Jackson
P.O. Box 22608
200 S. Lamar Street, Suite 100 (39201-4099)
Jackson, MS 39225-2608
601/960-8600
Fax: 601/960-8613
Email: mulhollanddj@fpwk.com

David H. Kramer - PHV
WILSON, SONSINI, GOODRICH & ROSATI, PC
650 Page Mill Road
Palo Alto, CA 94304-1050
650/493-9300
Fax: 650/565-5100
Email: dkramer@wsgr.com

Fred Krutz, III
FORMAN, PERRY, WATKINS, KRUTZ & TARDY
P.O. Box 22608
Jackson, MS 39225-2608
(601) 960-8600
Email: fred@fpwk.com

Blake C. Roberts - PHV
WILMER, CUTLER, PICKERING, HALE & DORR, LLP - Washington
1801 Pennsylvania Avenue, NW
Washington, DC 20006
202/663-6920
Fax: 202/663-6363
Email: blake.roberts@wilmerhale.com

Jamie S. Gorelick - PHV
WILMER, CUTLER, PICKERING, HALE & DORR, LLP - Washington
1801 Pennsylvania Avenue, NW
Washington, DC 20006
202/663-6500
Fax: 202/663-6363
Email: jamie.gorelock@wilmerhale.com

Patrick J. Carome - PHV
WILMER, CUTLER, PICKERING, HALE AND DORR, LLP - Washington
1875 Pennsylvania Avenue, NW
Washington, DC 20006
202/663-6610
Fax: 202/663-6363
Email: patrick.carome@wilmerhale.com

Peter Neiman - PHV
WILMER, CUTLER, PICKERING, HALE AND DORR, LLP - New York
7 World Trade Center
250 Greenwich Street
New York, NY 10007
212/295-6487
Fax: 212/230-8888
Email: peter.neiman@wilmerhale.com

Violetta G. Watson - PHV
WILMER, CUTLER, PICKERING, HALE AND DORR, LLP - New York
7 World Trade Center
250 Greenwich Street
New York, NY 10007
212/230-8800
Fax: 212/230-8888
Email: violetta.watson@wilmerhale.com

This the 12th day of January, 2015.

/s/ Douglas T. Miracle
DOUGLAS T. MIRACLE