

Nelson Mullins

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April 3, 2007

Via Facsimile

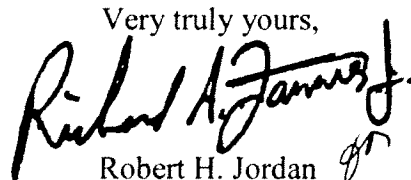
Frank M. Cisa, Esquire
Cisa & Dodds, LLP
622 Johnnie Dodds Boulevard
Mt. Pleasant, SC 29464

RE: Trademark Properties and Richard C. Davis v. A&E Television Networks and
Max Weissman Productions, Inc. d/b/a Departure Films
USDC Civil Action No.: 2:06-CV-2195-CWH
Our File No.: 28692/01500
Chubb File No. 133228

Dear Frank:

As you know, yesterday the defendants filed a motion for summary judgment and supporting memorandum of law and declarations in the above-referenced matter. The declaration of Nancy Dubuc and declaration of Charles Nordlander were filed as public documents. The memorandum of law and my declaration were filed as sealed documents. We filed the motion and memorandum of law under seal in an abundance of caution. We do not think the motion or anything in the memorandum is confidential but wanted to give you an opportunity to review it before we made it public. If you do not object within 7 days (April 10) to the filing of the motion and memorandum as public documents, we intend to contact the Clerk of Court and have the motion and memorandum designated as public documents. Because my declaration has confidential documents and deposition excerpts attached as exhibits, we presently intend for it to remain under seal. We reserve our right to de-designate some or all of the exhibits.

Please let me know if you have any questions regarding this matter.

Very truly yours,

Robert H. Jordan

RHJ:nds

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March 2, 2007

VIA-FACSIMILE (843) 722-8700 AND U.S. MAIL

Robert H. Jordan, Esquire
Nelson Mullins Riley & Scarborough, LLP
P.O. Box 1806
Charleston, SC 29402

RE: Trademark Properties, Inc. and Richard C. Davis v. A&E Television Networks, ABC, Inc., NBC Universal, Departure Films, et. al
Case No.: 2006-CP-10-2822
Our file: 06-646

Dear Robert:

I have reviewed the Defendant's Motion for Summary Judgment and Supporting Memorandum of Law relative to the issue that you raise about contacting the Clerk to have the motion and memorandum designated as public documents. I assume this also means that you want all of your exhibits to the memorandum declared public. If I am incorrect please let me know.

On behalf of the Plaintiffs I do object to you making public the exhibit "J" to your memorandum which is a private placement memorandum dated January 25, 2005 as well as Exhibit "Y" which is the talent agreement dated as of March 13, 2006.

I will be out of the office this afternoon but please give me a call tomorrow morning to discuss this matter.

With kindest regards, I am

Very truly yours,



Frank M. Cisa

FMC/alp

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April 11, 2007

Via Facsimile

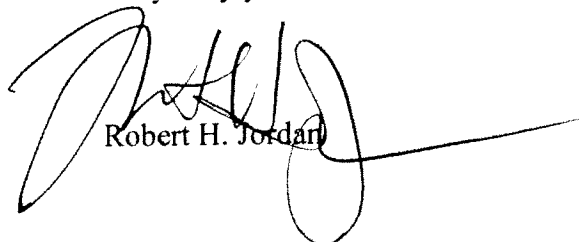
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RE: Trademark Properties and Richard C. Davis v. A&E Television Networks and
Max Weissman Productions, Inc. d/b/a Departure Films
USDC Civil Action No.: 2:06-CV-2195-CWH
Our File No.: 28692/01500
Chubb File No. 133228

Dear Frank:

I received your letter yesterday regarding the confidentiality of *Defendants' Motion for Summary Judgment, Supporting Memorandum of Law*, and my supporting affidavit. To be clear, we only intend to designate the motion and memorandum as public documents. My affidavit and all the attached exhibits will remain under seal. Therefore, exhibits "J" and "Y" will remain under seal. I trust this satisfies your concern. We will contact the Clerk's office this week to have the motion and memorandum designated as public documents.

Very truly yours,



Robert H. Jordan

RHJ:nds

cc: Jeremy Feigelson, Esq.
Richard A. Farrier, Jr., Esq.