

From: Geldmacher, Kate <KGeldmacher@reedsmith.com> Thu, Jul 2, 2020 at 9:30 AM
Cc: "Carlson, Jacqueline A." <JCarlson@reedsmith.com>,
"Riddle, Robert R." <RRiddle@reedsmith.com>

Hello,

We are intellectual property litigation counsel for Siemens Industry Software Inc. ("SISW"), formerly Siemens Product Lifecycle Management Software Inc., a manufacturer and distributor of product lifecycle management software.

Based on information available to SISW, we believe that Lantern users have, among other prohibited acts, willfully violated the copyrights of SISW under the Copyright Act of 1976, 17 U.S.C. § 101, et. seq. These actions have caused substantial damage to SISW, which has invested significant time, effort, and resources in developing and manufacturing its PLM software. SISW owns numerous valuable federally registered copyrights related to these products, and their use requires a lawful license to be purchased from SISW. Nevertheless, some Lantern users obtained and illegally installed and used the software.

In order to protect its intellectual property against unlawful use, SISW filed an action in the U.S. District Court for the Southern District of Texas on March 5, 2020. As part of its initial filings, SISW filed a motion for expedited discovery seeking the identities of the Doe Defendants from Digital Ocean, LLC. *Siemens Industry Software Inc. v. Does 1-10*, No. 4:20-cv-801, Dkt. 4 (S.D. Tex. Mar. 5, 2020). Pursuant to court order on April 16, 2020, SISW contacted DigitalOcean to resolve the discovery dispute without court intervention. As a result, DigitalOcean identified Lantern as the virtual private network (VPN) provider or similar service provider for three of the Doe Defendants. Under Judge Hanks procedures, parties and non-parties are required to confer in good faith to resolve discovery disputes. If counsel are unable to reach an agreement, the parties must file a joint letter outlining the issues.

Accordingly, we are contacting you seeking any documents, including specifically any electronic records, sufficient to identify the Subscriber Information for the Account Holders who currently utilize the following IP addresses and/or the Account Holders who utilized the following IP addresses at the times indicated in the below chart. We understand the term "Account Holder" to mean any person or persons who contracted or otherwise engaged in a business or commercial transaction with Lantern for hosting/internet or related services. "Subscriber Information" includes: (1) the real name of the Account Holder; (2) the mailing address of the Account Holder; (3) the telephone number of the Account Holder; (4) the email address of the Account Holder; and (5) any other information that would aid SISW in determining the identity of these Account Holders.

Doe	Date	Time (UTC -5:00)	IP Address
2	24-Oct-19	5:55	104.248.11.82
8	30-Jun-19	19:24	165.22.255.238
9	5-Jul-19	8:03	167.71.196.81

We hope to avoid the costly subpoena process, and look forward to working with you to gather this information. If we do not hear from you by **Thursday, July 16, 2020**, we plan to file a letter outlining the need for the requested discovery and our attempts to contact Lantern. If there is a different person we should contact within Lantern, we ask that you redirect this communication accordingly.

We look forward to hearing from you.

Thank you and warm regards,

Kate

Kate Geldmacher

Associate - ReedSmith LLP

811 Main Street | Suite 1700 | Houston, TX 77002

Working Remotely | 205.767.7028 | kgeldmacher@reedsmith.com

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