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Legal Document

Delaware Court of Chancery
Case No. 2022-0613-KSJM

**Twitter, Inc. v. Elon R. Musk, X Holdings I, Inc., and X
Holdings II, Inc.**

Document 654



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**REDACTED PUBLIC VERSION
DATED: September 28, 2022**

Exhibit A

WACHTELL, LIPTON, ROSEN & KATZ

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LEONARD M. ROSEN (1965-2014)

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HAROLD S. NOVIKOFF
LAWRENCE B. PEDDWITZ

ERIC S. ROBINSON
ERIC M. ROTH
PAUL K. ROWE
DAVID A. SCHWARTZ
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PAMELA EHRENKRANZ
KATHRYN GETTLES-ATWA
ADAM M. GOGOLAK

NANCY B. GREENBAUM
MARK A. KOENIG
CARMEN X.W. LU
J. AUSTIN LYONS
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DAVID E. SHAPIRO
DAMIAN G. DIDDEN
IAN BOCCZO

MATTHEW M. GUEST
DAVID E. KAHAN
DAVID K. LAM
BENJAMIN M. ROTH
JOSHUA A. FELTMAN
ELAINE P. GOLIN
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SARAH K. EDDY
VICTOR GOLDFELD
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SABASTIAN V. NILES
ALISON ZIESKE PREISS
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LUMERMANN
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NOAH B. YAVITZ

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DIRECT FAX: (212) 403-2108

E-MAIL: BRWILSON@WLRK.COM

August 30, 2022

BY EMAIL

David S. Mader, Esq.
Quinn Emanuel Urquhart & Sullivan, LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010

Re: *Twitter, Inc. v. Musk, et al.*, C.A. No. 2022-0613-KSJM (Del. Ch.)

Dear Mr. Mader:

Last night, defendants represented that they had substantially completed their document production. We have grave concerns about that representation. We have identified several major deficiencies that cast substantial doubt on defendants' discovery efforts across the board:

First, our preliminary review of the text messages produced from Mr. Musk's and Mr. Birchall's devices has revealed substantial gaps in production corresponding to critical time periods. For example, Mr. Musk's production includes just four text messages from May 6 (three of which are non-substantive messages with Sean Combs, and the fourth of which is a

David S. Mader, Esq.
August 30, 2022
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message from Twitter's Ned Segal) and zero text messages from May 7 through May 11 — a particularly critical period during which defendants allege Mr. Musk was reconsidering his acquisition of Twitter. Mr. Musk has likewise produced zero texts from a weeklong period around June 4, the date on which he determined to adopt the position that Twitter had breached the Merger Agreement. *Id.*

Mr. Musk and Mr. Birchall's text message productions have other unexplained omissions. Most notably, defendants have not produced a single text message between Mr. Musk and Mr. Birchall from the period between May 2 and May 12, even though it is clear that these custodians texted each other regularly about relevant subjects. And the respective text message productions of both Mr. Musk and Mr. Birchall include messages that are missing from the other's production. Moreover, in a text exchange from June 17, Robert Steel of Perella Weinberg Partners engages in a dialogue with Mr. Musk for which all of Mr. Musk's replies are missing.

We ask that you account for these apparent deficiencies by 8:00 this evening, August 30.

Second, during the meet-and-confer process, you identified a review population of 50,435 documents for Mr. Musk and Mr. Birchall's custodial records. This population has necessarily increased in light of defendants' multiple agreements to add email accounts and search terms to their review. Yet defendants have produced only 1,660 documents, yielding a responsiveness rate of about 3%.

This improbable result causes us to question the responsiveness criteria that defendants have applied in their review process. By way of example, there were 4,086 documents returned just by the targeted term ("Mdad* OR MAU * OR Dad* OR UAM OR mMAU") for Mr. Musk — but apparently *less than half* of those documents were identified for production. We do not understand how this could be so.

We ask that you account for defendants' implausibly low rate of production by 8:00 this evening, August 30.

Third, defendants are subject to a court order requiring them to supplement their deficient responses to Twitter's Interrogatory Nos. 1, 2, 12, and 17, including by providing full disclosure of "all persons with knowledge of or involvement in" the topics listed in those Interrogatories. Dkt. 221 at 5. On August 26, defendants purported to supplement their responses to bring them into compliance with the Court's Order. Those supplemented responses identified only persons and entities Twitter already knew had relevant knowledge, and thus disclosed nothing.

Defendants' production of text messages yesterday confirms that your revised interrogatory responses omitted many other individuals with whom Mr. Musk had substantive

WACHTELL, LIPTON, ROSEN & KATZ

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communications about the merger, including: Mr. Steel, Michael Kives of K5 Global; Ari Emanuel of Endeavor; Adeo Ressi of VC Lab; and Andrea Stroppa.

We believe defendants' unwillingness to prepare complete interrogatory is inexcusable and we intend to seek appropriate relief from the Court. In the meanwhile, we ask that you provide complete revised interrogatory responses by 8:00 this evening, August 30.

Sincerely,

A handwritten signature in black ink that reads "Bradley R. Wilson". The signature is written in a cursive, flowing style.

Bradley R. Wilson

Exhibit B

From: David Mader
Sent: Tuesday, August 30, 2022 11:34 PM
To: Kirk, David E.
Cc: Silpa Maruri; Kathryn Bonacorsi; Emily Kapur; Andrew J. Rossman; Alex Spiro; Christopher Kercher; Matthew Fox; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP); Rosenello, Lauren N; Shannon, Kevin R. (Potter Anderson & Corroon LLP); Kelly, Christopher N. (Potter Anderson & Corroon LLP); Slight, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC); Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC); Savitt, William D.; Wilson, Bradley R.; Eddy, Sarah K.; McLeod, Ryan A.; Reddy, Anitha; Yavitz, Noah B.; Goodman, Adam L.; Sadinsky, Alexandra P.
Subject: RE: Twitter v. Musk et al. - Significant Production Deficiencies

Counsel, we are in receipt of the correspondence attached to your e-mail of 10:04 a.m. this morning and expect to provide a response, as well as supplemental interrogatory responses, tomorrow.

Regards,

David

David Mader

Partner

Quinn Emanuel Urquhart & Sullivan LLP.

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From: Kirk, David E. <DEKirk@wlrk.com>

Sent: Tuesday, August 30, 2022 10:04 AM

To: David Mader <davidmader@quinnemanuel.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Kathryn Bonacorsi <kathrynbacorsi@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Andrew J. Rossman <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Christopher Kercher <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slight, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Wilson, Bradley R. <BRWilson@wlrk.com>; Eddy, Sarah K. <SEddy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AREddy@wlrk.com>; Yavitz, Noah B. <NBAYavitz@wlrk.com>; Goodman, Adam

L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>

Subject: Twitter v. Musk et al. - Significant Production Deficiencies

[EXTERNAL EMAIL from dekirk@wlrk.com]

Counsel,

Please see the attached correspondence from Brad Wilson.

Regards,

David

=====
Please be advised that this transmittal may be a confidential attorney-client communication or may otherwise be privileged or confidential. If you are not the intended recipient, please do not read, copy or re-transmit this communication. If you have received this communication in error, please notify us by e-mail (helpdesk@wlrk.com) or by telephone (call us collect at 212-403-4357) and delete this message and any attachments.

Thank you in advance for your cooperation and assistance.

Exhibit C

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

TWITTER, INC.,)
)
Plaintiff and)
Counterclaim-Defendant,)
)
v.) C.A. No. 2022-0613-KSJM
)
ELON R. MUSK, X HOLDINGS I, INC.,)
and X HOLDINGS II, INC.,)
)
Defendants and)
Counterclaim-Plaintiffs.)

**DEFENDANTS' FOURTH SUPPLEMENTAL RESPONSES
AND OBJECTIONS TO PLAINTIFF'S FIRST SET OF
INTERROGATORIES TO DEFENDANTS**

Pursuant to Court of Chancery Rules 26 and 33, Defendants and Counterclaim-Plaintiffs Elon R. Musk, X Holdings I, Inc., and X Holdings II, Inc. (“Defendants”), by and through their undersigned counsel, hereby provide their Fourth Supplemental Responses and Objections to the First Set of Interrogatories to Defendants, dated July 22, 2022 (each an “Interrogatory” and together the “Interrogatories”), served by Plaintiff and Counterclaim-Defendant Twitter, Inc. in the above-captioned action (the “Action”).

GENERAL OBJECTIONS

1. Defendants hereby incorporate herein the General and Specific Objections in their August 5, 2022 Responses and Objections to Plaintiff’s First Set of Interrogatories. By making these Supplemental Responses, Respondents do not

waive any of those General or Specific Objections or concede that their original responses do not fully answer the Interrogatories as limited by Respondents' objections or are otherwise deficient. Respondents reserve the right to further amend any of their Responses and Objections to Plaintiff's First Set of Interrogatories.

SPECIFIC RESPONSES AND OBJECTIONS

INTERROGATORY NO. 1:

Identify all Persons with knowledge concerning, information relevant to, and/or possession, custody, or control over Documents or Communications relating to any of the allegations in the Complaint and/or any of the claims or arguments in the July 8, 2022 Letter, and, as applicable, describe the general subject matter of each such Person's relevant knowledge or information or the general subject matter of the relevant Documents or Communications in their possession, custody, or control.

RESPONSE TO INTERROGATORY NO. 1:

Defendants object to this Interrogatory as overbroad and as seeking information not relevant to the parties' claims and defenses.

Subject to and without waiving their General Objections and specific objections, Defendants state that, based upon a reasonable inquiry and to the best of their knowledge at this time, the following is a list of persons with unique knowledge concerning the Merger, the Merger Agreement, and the parties' claims and/or defenses in this Action:

1. **Elon R. Musk ("Musk").** Knowledgeable as to the negotiation, execution, and termination of the Merger Agreement.
2. **Jared Birchall.** Knowledgeable as to the negotiation, execution, and termination of the Merger Agreement.

3. **Bob Swan.** Knowledgeable as to business and financial modeling for Twitter's operations should the transaction have closed.
4. **Antonio Gracias.** Knowledgeable as to business and financial modeling for Twitter's operations, and transaction financing, should the transaction have closed.
5. **Twitter, Inc.** The full extent of Twitter directors, officers, employees, and contractors with relevant knowledge as to the negotiation, execution, and termination of the Merger Agreement, and Twitter's business and operations, is information known only by Twitter itself.
6. **Skadden, Arps, Slate, Meagher & Flom LLP.** Mike Ringler, Sonia Nijjar. Knowledgeable as to the negotiation, execution, and termination of the Merger Agreement.
7. **Quinn Emanuel Urquhart & Sullivan, LLP.** Alex Spiro. Knowledgeable as to the negotiation, execution, and termination of the Merger Agreement.
8. **Morgan Stanley.** Anthony Armstrong, Owen O'Keefe, Michael Grimes, Kate Claassen. Knowledgeable as to financial analysis and negotiation of the transaction.
9. **Morgan Stanley Senior Funding, Inc.** Andrew Earl. Knowledgeable as to the bank debt financing commitments for the transaction.
10. **Andreessen Horowitz, AH Capital Management, L.L.C. (a16z).** Scott Kuper. Knowledgeable as an equity co-investor alongside Musk.
11. **A.M. Management & Consulting.** Andrew Medjuck. Knowledgeable as an equity co-investor alongside Musk.
12. **Aliya Capital Partners LLC.** Ross Kestin. Knowledgeable as an equity co-investor alongside Musk.
13. **BAMCO, Inc. (Baron).** Patrick Patalino. Knowledgeable as an equity co-investor alongside Musk.

14. **Binance Capital Management Co., Ltd.** Kaiser Ng. Knowledgeable as an equity co-investor alongside Musk.
15. **Brookfield Asset Management, Inc.** Nicholas Sammut, Nicholas Goodman. Knowledgeable as an equity co-investor alongside Musk.
16. **DFJ Growth IV Partners, LLC.** Randall Glein. Knowledgeable as an equity co-investor alongside Musk.
17. **Fidelity Management & Research Company LLC.** Chris Maher. Knowledgeable as an equity co-investor alongside Musk.
18. **Honeycomb Asset Management LP.** Vick Sandhu. Knowledgeable as an equity co-investor alongside Musk.
19. **Key Wealth Advisors LLC.** Ahmad Razi Karim. Knowledgeable as an equity co-investor alongside Musk.
20. **Lawrence J. Ellison Revocable Trust.** Paul Marinelli. Knowledgeable as an equity co-investor alongside Musk.
21. **Litani Ventures.** Peter Rahal. Knowledgeable as an equity co-investor alongside Musk.
22. **Qatar Investment Authority.** Ahmad Al-Khjani. Knowledgeable as an equity co-investor alongside Musk.
23. **Sequoia Capital Fund, L.P.** Douglas Leone. Knowledgeable as an equity co-investor alongside Musk.
24. **Strauss Capital LLC.** Daniel Strauss. Knowledgeable as an equity co-investor alongside Musk.
25. **Tresser Blvd 402 LLC (Cartenna).** Peter Avellone. Knowledgeable as an equity co-investor alongside Musk.
26. **VyCapital.** Katja Lake, Daniel Schwarz. Knowledgeable as an equity co-investor alongside Musk.
27. **Witkoff Capital.** Zachary Witkoff. Knowledgeable as an equity co-investor alongside Musk.

28. **HRH Prince Alwaleed Bin Talal Bin Abdulaziz Alsaud (Kingdom).** Knowledgeable as an equity co-investor alongside Musk.
29. **Bank of America, N.A.** Knowledgeable as to the debt financing of the Merger.
30. **BOFA Securities, Inc.** Knowledgeable as to the debt financing of the Merger.
31. **Barclays.** Knowledgeable as to the debt financing of the Merger.
32. **MUFG.** Knowledgeable as to the debt financing of the Merger.
33. **Societe Generale.** Knowledgeable as to the debt financing of the Merger.
34. **Mizuho Bank Ltd.** Knowledgeable as to the debt financing of the Merger.
35. **BNP Paribas.** Knowledgeable as to the debt financing of the Merger.
36. **BNP Paribas Securities Corp.** Knowledgeable as to the debt financing of the Merger.
37. **Goldman Sachs.** Knowledgeable as to the value of Twitter in connection with its modeling of the transaction and preparation of a fairness opinion.
38. **J.P. Morgan.** Knowledgeable as to the value of Twitter in connection with its modeling of the transaction and preparation of a fairness opinion.
39. **Allen & Company LLC.** Knowledgeable as to the value of Twitter in connection with its modeling of the transaction.
40. **Simpson Thacher & Bartlett LLP.** Alan Klein. Knowledgeable as to the negotiation, execution, and termination of the Merger Agreement.

41. **Wilson Sonsini Goodrich & Rosati PC.** Marty Korman. Knowledgeable as to the negotiation, execution, and termination of the Merger Agreement.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1:

Subject to and without waiving the foregoing General Objections and specific objections, Defendants identify the additional entities, who are equity co-investors alongside Musk and as such, have knowledge of their equity investments:

42. **AJG Growth Fund, LLC**
43. **Bandera Partners, LLC**
44. **Debala Trust (aka Karim Hakimzadeh)**
45. **Eden Global Investments L.P.**
46. **GFNCI LLC**
47. **Manhattan Venture Partners X LLC**
48. **Opportunity Fund X, a Series of Factorial Funds I LLC**
49. **Qatar Holding LLC**
50. **Santo Lira LLC**
51. **Section 32 Fund 4, LP**
52. **Tomales Bay Capital CGF ZHR IX, LP**
53. **Tru Arrow Technology Partners CIV II, LP**
54. **Yuxiang (Robin) Ren**

SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1:

Subject to and without waiving the foregoing General Objections and specific objections, Defendants identify the additional entities as having knowledge regarding the topics called for in this Interrogatory:

Knowledgeable as investors approached by Morgan Stanley on Defendants' behalf regarding an equity investment:

55. **Access Industries**
56. **Advent**
57. **Andrew Finn, Tim Urban, Quentin Koffey**
58. **Apollo**
59. **Aristotle Capital**
60. **ARK Investment Management LLC**
61. **Ashler Capital**
62. **Balyasny**
63. **BlackRock**
64. **Blackstone**
65. **Block.one (Michael Lubin)**
66. **BOND (Mary Meeker)**
67. **Boston Management/Eaton Vance**
68. **Brian Armstrong**
69. **Brinley Partners**
70. **California Regents**
71. **Capital Group**
72. **Carlyle**
73. **CDPQ**
74. **Centerbridge**
75. **Claire Group (Marcelo Claire)**

76. **ClearBridge**
77. **Clearlake**
78. **Coatue**
79. **Combs Enterprises**
80. **Cowbird Capital**
81. **CPPIB**
82. **Craft Ventures**
83. **D1 Capital**
84. **DaGrosa Capital Partners**
85. **Dash Wasserstein**
86. **Diameter**
87. **Dorilton Capital**
88. **Dragoneer**
89. **EL Acquisitions Steve Ellman**
90. **Emilio Masci**
91. **First Republic (Joe Gebbia)**
92. **Founders Fund**
93. **Francisco Partners**
94. **Frank McCourt**
95. **General Atlantic**
96. **General Catalyst**
97. **GIC**
98. **Gigafund**

99. **GoldenTree**
100. **Gregory Cohen (Rambleside)**
101. **Greycroft**
102. **Grok Ventures**
103. **GSAM**
104. **Guggenheim**
105. **Hellman & Friedman**
106. **Hither Creek Ventures (Zander Farkas)**
107. **HPS Partners**
108. **HRS Management**
109. **Iconiq**
110. **Insight**
111. **IVP**
112. **Jack Dorsey**
113. **Jill Smoller**
114. **John Catsimatidis**
115. **K5 Global (Michael Kives)**
116. **Ken Griffin**
117. **Ken Howery**
118. **Larry A Mizel**
119. **LAUNCH (Jason Calacanis)**
120. **Level Four LLC (Joe Rogan)**
121. **Liontree**

122. **Long View (Crown)**
123. **Lutetia Capital**
124. **Marc Benioff**
125. **Mark Cuban**
126. **Mayor Bloomberg (Willett Advisors)**
127. **Michael Pollack**
128. **Mirae**
129. **MSD Partners**
130. **MSIM Private**
131. **MSIM Public**
132. **Naval Ravikant**
133. **Nelk (John Shahidi)**
134. **Nikesh Arora**
135. **Nikko Asset Mgmt. (Americas)**
136. **Norges**
137. **North Fifth Services (Bill Ford)**
138. **Nuveen (TIAA)**
139. **Oaktree**
140. **OTPP**
141. **Owl Rock (Blue Owl)**
142. **Palm Tree Crew**
143. **Paradigm (Matt Huang)**
144. **Pegasus Ventures**

145. **Peltz**
146. **Pershing Square**
147. **PIMCO**
148. **Pomegranate (Clay Whitehead)**
149. **Prometheus**
150. **Red Apple Holdings, Inc.**
151. **Reid Hoffman**
152. **Reprogrammed Interchange LLC**
153. **Revere Capital**
154. **Revere Securities**
155. **Ross Gerber**
156. **Safra**
157. **Samuel Bankman-Fried (FTX)**
158. **Scott Nolan**
159. **Security Benefit**
160. **Senator**
161. **Sixth Street**
162. **Skip Capital**
163. **Skip Enterprises Pty Ltd**
164. **Snowdevil Capital / Thistledown (Matt Cowin)**
165. **Softbank**
166. **Southpoint Capital**
167. **S.P. Hinduja Private Bank Ltd**

168. **SRS Investment Mgmt.**
169. **T. Rowe Price**
170. **TCV**
171. **Teknecap**
172. **Thor Halvorsen**
173. **Thrive**
174. **Thrivent**
175. **TPG**
176. **UC Regents (Jagdeep Bachher)**
177. **University of Michigan**
178. **Veritas Capital**
179. **Viking Global**
180. **Warburg**
181. **Web3 Foundation**
182. **YLEM (Bastian Lehmann)**

Knowledgeable as individuals with whom Mr. Musk discussed Twitter/the Merger generally:

183. **Steve Jurvetson**
184. **Jason Calacanis**
185. **Joe Lonsdale**
186. **David Sacks**

THIRD SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1:



Subject to and without waiving the foregoing General Objections and specific objections, Defendants identify the additional entities and individuals as having




knowledge regarding the topics called for in this Interrogatory based on communications produced by Defendants in this litigation:

187. **Aaron Levie**
188. **Aaron Rappaport**
189. **Aashish Sharma**
190. **Abram Brown**
191. **Adeo Ressi**
192. **Adil Bhatia**
193. **Alanah Pearce (96997907 - @Charalanahzard)**
194. **Alex Berenson**
195. **Alex Stillings**
196. **Alex Swieca**
197. 
198. **Alexander Chernyak**
199. **Alexander Sherman**
200. **Alexandra Musk**
201. **Alwaleed bin Talal Al Saud**
202. **Alwaleed Tlal**
203. 
204. **Amir Efrati**
205. **Andraz Razen**

206. [REDACTED]
207. **Andrea Stroppa (541882699 => @andst7)**
208. [REDACTED]
209. **Andrew Earls**
210. **Andrew Finn**
211. **Andrew Perlman**
212. **Andy Harrison**
213. **Angus Berwick**
214. **Anish Shah**
215. **Annie Palmer**
216. **Anshuman Mishra**
217. **Anthony Armstrong**
218. **Anthony Cicia**
219. **Anthony Scaramucci**
220. **Antoine Gara**
221. **Anton.Mayr**
222. [REDACTED]
223. **Ari Emanuel**
224. **Arif Ahmed**
225. **Ashlee Vance (81961201 - @ashleevance)**

- 226. **Audra Johnson**
- 227. **Austin Pang**
- 228. **Bastian Lehmann**
- 229. **Beau Davidson**
- 230. **Ben Enowitz**
- 231. **Ben Silverman**
- 232. **Ben Wormsley**
- 233. **Benjamin Goodman**
- 234. **Benjamin Holland**
- 235. **Benny Johnson**
- 236. **Berkeley Fondren**
- 237. **Bill Lee**
- 238. **Blake Hall**
- 239. **Bob Steel**
- 240. **Bobby Allyn**
- 241. **Brad S. Sheftel**
- 242. **Bradford Betz**
- 243. **Bradley Diener**
- 244. **Brandon J. Sanford**
- 245. **Brandon Kaufmann**

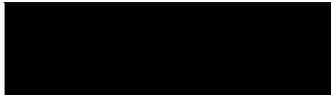
- 246. **Bret Johnsen**
- 247. **Bret Taylor**
- 248. **Brett Rochkind**
- 249. **Brian Acton**
- 250. **Brian Kingston**
- 251. **Brian Schwartz**
- 252. **Brian Snyder**
- 253. 
- 254. **Bryan Baum**
- 255. 
- 256. **C Ndu Ozor**
- 257. **Cameron Winklevoss**
- 258. **Carlos Slim**
- 259. **Cary Thompson**
- 260. **Cat Zakrzewski**
- 261. **Cathie Wood (2361631088 => @CathieDWood)**
- 262. **Charles Sheehan**
- 263. **Ching Liu Huang**
- 264. **Chris Anderson**
- 265. **Chris Stokel-Walker**


- 266. **Chris Zhang**
- 267. 
- 268. 
- 269. **Colin Stewart**
- 270. **Corey T. Kozak**
- 271. **CPG Grey (176774540 => @cgpgrey)**
- 272. **Craig Farr**
- 273. **Craig Robins**
- 274. 
- 275. **Dan Sundheim**
- 276. **Dana Hull**
- 277. **Daniel Brunt**
- 278. **Daniel Freeman**
- 279. **Daniel Tay**
- 280. **Darren Rovell**
- 281. **Dave Rubin**
- 282. **Dave Smith**
- 283. **David Dwek**
- 284. **David E. Kaufman**
- 285. **David George**


286. **David Sacks**
287. **David Solomon**
288. **Dennis Baughman**
289. **Derek Dillon**
290. **Dick Costolo**
291. **Dickson Law**
292. **Diesel Peltz**
293. **Dimitar Valchev**
294. **Dinesh D-Souza**
295. **Doug Leone**
296. **Douglas M. Palmer**
297. **Douglas MacMillan**
298. **Dr. Bradley Jabour**
299. **Dr. Ulf Poschardt**
300. **Edward Ludlow**
301. **Elif Bilgi**
302. **Endeavor**
303. **Eric A. Gray**
304. **Eric Kirkland**
305. **Errol Musk**


- 306. **Evan Fiedler**
- 307. **Faisal Baloch**
- 308. **Faiz Siddiqui**
- 309. **Fiona Osullivan**
- 310. **Frank Malone**
- 311. **Frank McCourt**
- 312. **Gabrielle Bienasz**
- 313. **Gabrielle S. Burke**
- 314. **Garett Varricchio**
- 315. **Gary Black**
- 316. **Gavin Baker**
- 317. **Gayle King**
- 318. **George Galloway**
- 319. **George Zachary**
- 320. **Glenn Fuhrman**
- 321. 
- 322. **Graham Brandt**
- 323. **Grimes (276540738 => @Grimezs)**
- 324. **Hannah Murphy**
- 325. **Henry Blodget**

- 326. **Hindenburg Research**
- 327. **Hiromichi Mizuno (72862939 - @hiromichimizuno)**
- 328. **History In Pics (1582853809 => @HistoryInPics)**
- 329. **Hyun Joo Jin**
- 330. **Ian Miles Cheong**
- 331. **Ian Osborne**
- 332. **Idena Team**
- 333. **Ihsan Essaid**
- 334. **Imran Salahuddin**
- 335. **Iqbaljit Kahlon**
- 336. **Ira Ehrenpreis**
- 337. **Ishay Levin**
- 338. 
- 339. **Jack Dorsey**
- 340. **James and Kathryn Murdoch**
- 341. **James Demare**
- 342. **James Fontanella-Khan**
- 343. **James Gorman**
- 344. **James Star**
- 345. **Jamie Star**

- 346. **Jared Groth**
- 347. **Jason Calacanis (3840 - @Jason)**
- 348. **Jason Zins**
- 349. **Jean-Francois Astier**
- 350. **Jeff Collins**
- 351. **Jeff Gramm**
- 352. **Jeff Skoll**
- 353. **Jeff Wood**
- 354. **Jeffery Stein**
- 355. **Jeffrey Sprecher**
- 356. **Jehn Balajadia**
- 357. 
- 358. **Jennifer King**
- 359. **Jeremy Erlich**
- 360. **Jeremy Parsels**
- 361. **Jessie Mae Atkinson**
- 362. **Jia Yang**
- 363. **Jillian Svendsen**
- 364. **Joe Lonsdale**
- 365. **Joel Carter**

- 366. **John Carmack**
- 367. **John Darsie**
- 368. **John Glaister**
- 369. **John Hering**
- 370. **John Lamb**
- 371. **John M. Brandow**
- 372. **John P. Zito**
- 373. **John Rich**
- 374. **John Rose**
- 375. **John Shahidi**
- 376. **John Stoll**
- 377. 
- 378. **John Tuttle**
- 379. **John-Christian Bourque**
- 380. **Johnna Crider**
- 381. **Johnna Lesch**
- 382. **Jon Neuhaus**
- 383. **Jonah Nolan**
- 384. **Jonathan Schlecht**
- 385. **Jonathan Silverman**

- 386. **Jordan Grossman**
- 387. **Joseph Jackson**
- 388. **Joseph Menn**
- 389. **Josh Raffaelli**
- 390. 
- 391. **Julia Bae**
- 392. **Julian Mettmann**
- 393. **Justin Riblet**
- 394. **Justin Roiland**
- 395. **Justin T. Smith**
- 396. **Kara Swisher**
- 397. **Karen Heller**
- 398. **Karen Klores**
- 399. **Karim Hakimzadeh**
- 400. **Karin Fronczke**
- 401. **Kassem Shafi**
- 402. **Keith Cowing**
- 403. **Kelvin K. Chan**
- 404. **Ken Griffin**
- 405. **Ken Howery**


- 406. **Kevin C. Brunner**
- 407. **Kevin Fronczke**
- 408. **Kevin Mitnick**
- 409. **Kevin Tu**
- 410. 
- 411. **Kimbal Musk**
- 412. **Kojiro Shizuka**
- 413. **Koushaw Ghaffarian**
- 414. **Kristina Salen**
- 415. **Kristy Mullen**
- 416. **Kyle Corcoran**
- 417. **Kyle Mann**
- 418. **Lance Ulanoff**
- 419. **Lauren Feiner**
- 420. **Lauren Hirsch**
- 421. **Laurence Braham**
- 422. **Lawrence J. Ellison**
- 423. **Leeder Hsu**
- 424. **Lewis Shepherd**
- 425. **Liana Baker**

- 426. **Liv Boeree**
- 427. **Lori Nicolet**
- 428. **Ludwig Kiermaier**
- 429. **Luke Nosek**
- 430. **Lynn Martin**
- 431. **Mansoor Ebrahim Al-Mahmoud**
- 432. 
- 433. **Marc Andreessen**
- 434. **Marc Merrill**
- 435. **Mark Matousek**
- 436. **Mark Pincus**
- 437. **Martha Lane Fox**
- 438. **Martin Viecha**
- 439. **Mason Bissada**
- 440. **Massimo (177101260 - @Rainmaker1973)**
- 441. **Mathias Döpfner**
- 442. **Matilda Simon-Ferrigno**
- 443. **Matt Cowin**
- 444. **Matt Durot**
- 445. **Matt Huang**



- 446. **Matt Lichtenberg**
- 447. **Matthew Koder**
- 448. **Matthew Savage**
- 449. **Maureen Dowd**
- 450. **Melissa MacPherson**
- 451. **Michael Dell**
- 452. **Michael Izard**
- 453. **Michael Kives**
- 454. **Michael Liedtke**
- 455. **Michael Tucker**
- 456. **Michael Tully**
- 457. **Michelle Lu**
- 458. **Mike Huckabee**
- 459. **Mike Schroepfer**
- 460. **Nagesh Saldi**
- 461. **Naor Amiel**
- 462. **Natalie Moses**
- 463. **Navaid Farooq**
- 464. **Naval Ravikant**
- 465. **Ned Segal**

- 466. **Neil J. Parikh**
- 467. **Nelson Peltz**
- 468. **Nichie Gamer (1558996520 => @nichegamer)**
- 469. **Nicholas Reimann**
- 470. **Nicholas Sammut**
- 471. **Nico Fine**
- 472. **Nilam Ganenthiran**
- 473. **Noah Echavarria**
- 474. **Olivier Osty**
- 475. **Omead Afshar**
- 476. **Orlando Bravo**
- 477. **Ortenca Aliaj**
- 478. **Otilie Hovell**
- 479. **Owen O'Keeffe**
- 480. **Parag Agrawal**
- 481. **Pat O'Malley**
- 482. **Paul Barrett**
- 483. **Paul Cheung**
- 484. **Paul Graham**
- 485. **Paul Griffiths**

486. **Paul Joseph Watson (18643437 => @PrisonPlanet)**
487. **Paul T. Marinelli**
488. **Peter Marsh**
489. **Peter P. Jones**
490. **Peter Weinberg**
491. **Philippe Laffont**
492. **Pinki Chaudhuri**
493. **Pueo Keffer**
494. **Quentin Koffey**
495. **Randy Glein**
496. **Reed Albergotti**
497. **Reed B. Rayman**
498. **Rehan Khursheed**
499. **Reid Hoffman**
500. **Richard Gallivan**
501. **Richard Hardegree**
502. **Richard Park**
503. **Richard Spencer**
504. **Richard von Wildemann**
505. **Rick Polhemus**

- 506. **Rishi D. Mangal**
- 507. 
- 508. **Robby Soave**
- 509. **Robert Herring**
- 510. **Robert Ruberton**
- 511. **Robert Zubrin**
- 512. **Robin Ren**
- 513. **Roelof Botha**
- 514. **Ron Baron**
- 515. **Ronald Gong**
- 516. **Ross Gerber**
- 517. **Ross Menachem Kestin**
- 518. **Rupert Murdoch**
- 519. **Ryan Israel**
- 520. **Sam Fort**
- 521. **Sam Harris**
- 522. **Sam Shead**
- 523. **Sam Teller**
- 524. **Samiuddin Sami**
- 525. **Sarang Gadkari**

- 526. **Satoshi Nakajima**
- 527. **Satya Nadella**
- 528. **Scott Adams**
- 529. **Scott Belsky (15698507 => @scottbelsky)**
- 530. **Scott Coulter**
- 531. **Scott Deveau**
- 532. **Scott Harries**
- 533. **Scott Nolan**
- 534. **Scott Painter**
- 535. **Sean C. Coburn**
- 536. **Sean Combs**
- 537. **Sean Edgett**
- 538. **Sean Lynch**
- 539. **Sekulic, Masa**
- 540. **Serkan Savasoglu**
- 541. **Shannon Bond**
- 542. **Shaun Maguire**
- 543. **Shawn W. Liu**
- 544. **Shervin Pishevar**
- 545. **Shivon Zilis (446719282 => @shivon)**

- 546. **Shoaib Qureshi**
- 547. **Sindhu Sundar**
- 548. **Solomon Bier**
- 549. 
- 550. **Sonu Kalra**
- 551. **Stacey Ferreira**
- 552. **Stacy Hock**
- 553. 
- 554. **Stephen Oskoui**
- 555. **Stephen Pesche**
- 556. **Stephen Wolfram**
- 557. **Steve Davis**
- 558. **Steve Jurvetson**
- 559. **Steve Weiner**
- 560. **Steven Brown**
- 561. **Steven Crowder**
- 562. **Steven Messina**
- 563. **Steven Rattner**
- 564. **Stockton Bullitt**
- 565. **SwiftOnSecurity (2436389418 -> @SwiftOnSecurity)**

- 566. **Sylvia Kaminska**
- 567. **Talulah Riley**
- 568. **Taly Kogon**
- 569. **Tamim Jabr**
- 570. **Tarik Brooks**
- 571. **Tatum Hunter**
- 572. **Taylor Wright**
- 573. **Teddy Gleser**
- 574. **Terrence Kontos**
- 575. **Thierry Breton**
- 576. **Thomas J. Sheehan**
- 577. **Thor Halvorsen**
- 578. **Tim Hughes**
- 579. **Tim Urban**
- 580. **Timothy Draper**
- 581. **Todd Morgenfeld**
- 582. **Tom Fitton**
- 583. **Tom Krisher**
- 584. **Tom Loef**
- 585. **Tom Maloney**

- 586. **Tom S. Hals**
- 587. **Tom Swerling**
- 588. **Tom van Loben Sels**
- 589. **Tracey Chenoweth**
- 590. **Trung Phan**
- 591. **Universal Sci (2993230373 => @universal_sci)**
- 592. **Vijaya Gadde**
- 593. **Vikas Shah**
- 594. **Vinod Jetley**
- 595. **Viv Hantusch**
- 596. **Wendi Murdoc**
- 597. **Will Knight**
- 598. **Will MacAskill**
- 599. **William Ackma**
- 600. **Willie Yglesias**
- 601. **Winnie Kong**
- 602. **Xavier Niel**
- 603. **Yousef Mohamed**
- 604. **Zheng Wang**
- 605. **@billym2k Shibetoshi Nakamoto**

- 606. **@erdayastronaut Everyday Astronaut**
- 607. **@Teslarati**
- 608. **@DoctorJack16**
- 609. **@waitbutwhy Tim Urban**
- 610. **@evafoxU Eva Fox**
- 611. **@murtakpak**
- 612. **@LexFridman Lex Fridman**
- 613. **@Cernovich Mike Cernovich**
- 614. **@WSBChairman**
- 615. **@MrStevenSteele Steven Steele**
- 616. **@stevenmarkryan**
- 617. **@Liz_Wheeler Liz Wheeler**
- 618. **@Boztank Boz**
- 619. **@ostynhyss Ostyn Hyss**
- 620. **@ppathole Pranay Pathole**
- 621. **@stockmktNewz**
- 622. **@jspeedymorris22 Joe Morris**
- 623. **@johnnaCrider1 Johnna Crider**
- 624. **@wholemarsblog**
- 625. **@uksaguy**

- 626. **@blkmdl3**
- 627. **@teslaownersSV**
- 628. **@politicalshort Nick Short**
- 629. **@somospostpc Alex Barredo**
- 630. **@BTC_Archive**
- 631. **@ICannot_Enough James Stephenson**
- 632. **@redletterdave Dave Smith**
- 633. **@chrisjbakke Chris Bakke**
- 634. **@garyblack00 Gary Black**
- 635. **@johnkrausphotos John Kraus**
- 636. **@engineers_feed**
- 637. **@dogeofficialceo**
- 638. **@watcherguru**
- 639. **@spideycyp_155**
- 640. **@RenataKonkoly Renata Konkoly**
- 641. **@andst7 Andrea Stroppa**
- 642. **@sawyermeritt Sawyer Merritt**
- 643. **@cybrtrck**
- 644. **@truth_tesla**
- 645. **@cb_doge**

- 646. **@ajtourville**
- 647. **@realmeetkevin Meet Kevin**
- 648. **@shacknews**
- 649. **@bloomberg**
- 650. **@itsallrisky**
- 651. **@sourpatchlyds**
- 652. **@libsofticktok**
- 653. **@obaidomer Obaid Omer**
- 654. **@mn_google Patel Meet**
- 655. **@catturd2**
- 656. **@coindesk**
- 657. **@squawksquare**
- 658. **@its_menieb Mohamed Enieb**
- 659. **@rationaletienne**
- 660. **@mazemoore**
- 661. **@dawggabriel Harold O Koenig**
- 662. **@coffeetabletsla**
- 663. **@fintwit_news**
- 664. **@blkmdl3**
- 665. **@modl3pilot**

- 666. **@teslarati**
- 667. **@occupymars42069**
- 668. **@mrstevensteele Steven Steele**
- 669. **@tarabull808**
- 670. **@jrdavidmitchell David Mitchell Jr**
- 671. **@veespike**
- 672. **@d2dev David Dales**
- 673. **@thecryptodaddi**
- 674. **@JaneidyEve Evelyn Janeidy Arevalo**
- 675. **@hamblinzeke**
- 676. **@drknowitall16**
- 677. **@ajtourville**

INTERROGATORY NO. 2:

Identify all Persons with knowledge concerning, information relevant to, and/or possession, custody, or control over Documents or Communications relating to Your efforts to arrange, obtain, syndicate, and/or consummate the Debt Financing or the Equity Financing, including without limitation (i) any law firm, financial advisor, or other institution engaged to advise or assist You in connection with the Debt Financing or the Equity Financing; (ii) any other Person that worked on Your behalf and/or represented Your interests in connection with the Debt Financing or the Equity Financing; (iii) any actual or potential provider of the Debt Financing; (iv) any law firm, financial advisor, or other institution engaged to advise or assist any actual or potential provider of the Debt Financing; (v) any actual or potential co-investor in the Equity Financing; and (vi) any law firm, financial advisor, or other institution engaged to advise or assist any actual or potential co-investor in the Equity Financing, and, as applicable, describe the general subject matter of each

such Person's relevant knowledge or information or the general subject matter of the relevant Documents or Communications in their possession, custody, or control.

RESPONSE TO INTERROGATORY NO. 2:

Defendants object to this Interrogatory as overbroad and as seeking information not relevant to the parties' claims and defenses.

Subject to and without waiving their General Objections and specific objections, Defendants state that, based upon a reasonable inquiry and to the best of their knowledge at this time, the following is a list of persons with knowledge regarding efforts to arrange, obtain, syndicate, and/or consummate the Debt Financing or the Equity Financing in connection with the Merger, the Merger Agreement, and the parties' claims and/or defenses in this Action:

1. **Elon R. Musk.** Knowledgeable as to the debt and equity financing of the Merger.
2. **Jared Birchall.** Knowledgeable as to the debt and equity financing of the Merger.
3. **Antonio Gracias.** Knowledgeable as to business and financial modeling for Twitter's operations, and transaction financing, should the transaction have closed.
4. **Skadden, Arps, Slate, Meagher & Flom LLP.** Mike Ringler. Knowledgeable as to the debt and equity financing of the merger.
5. **Morgan Stanley.** Anthony Armstrong, Owen O'Keefe, Michael Grimes, Kate Claassen. Knowledgeable as to financial analysis and negotiation of the transaction.
6. **Morgan Stanley Senior Funding, Inc.** Andrew Earl. Knowledgeable as to the debt financing of the Merger.

7. **Bank of America, N.A.** Knowledgeable as to the debt financing of the Merger.
8. **BOFA Securities, Inc.** Knowledgeable as to the debt financing of the Merger.
9. **Barclays.** Knowledgeable as to the debt financing of the Merger.
10. **MUFG.** Knowledgeable as to the debt financing of the Merger.
11. **BNP Paribas.** Knowledgeable as to the debt financing of the Merger.
12. **BNP Paribas Securities Corp.** Knowledgeable as to the debt financing of the Merger.
13. **Mizuho Bank, Ltd.** Knowledgeable as to the debt financing of the Merger.
14. **Societe Generale.** Knowledgeable as to the debt financing of the Merger.
15. **Andreessen Horowitz, AH Capital Management, L.L.C. (a16z).** Scott Kuper. Knowledgeable as an equity co-investor alongside Musk.
16. **A.M. Management & Consulting.** Andrew Medjuck. Knowledgeable as an equity co-investor alongside Musk.
17. **Aliya Capital Partners LLC.** Ross Kestin. Knowledgeable as an equity co-investor alongside Musk.
18. **BAMCO, Inc. (Baron).** Patrick Patalino. Knowledgeable as an equity co-investor alongside Musk.
19. **Binance Capital Management Co., Ltd.** Kaiser Ng. Knowledgeable as an equity co-investor alongside Musk.
20. **Brookfield Asset Management, Inc.** Nicholas Sammut, Nicholas Goodman. Knowledgeable as an equity co-investor alongside Musk.

21. **DFJ Growth IV Partners, LLC.** Randall Glein. Knowledgeable as an equity co-investor alongside Musk.
22. **Fidelity Management & Research Company LLC.** Chris Maher. Knowledgeable as an equity co-investor alongside Musk.
23. **Honeycomb Asset Management LP.** Vick Sandhu. Knowledgeable as an equity co-investor alongside Musk.
24. **Key Wealth Advisors LLC.** Ahmad Razi Karim. Knowledgeable as an equity co-investor alongside Musk.
25. **Lawrence J. Ellison Revocable Trust.** Paul Marinelli. Knowledgeable as an equity co-investor alongside Musk.
26. **Litani Ventures.** Peter Rahal. Knowledgeable as an equity co-investor alongside Musk.
27. **Qatar Investment Authority.** Ahmad Al-Khjani. Knowledgeable as an equity co-investor alongside Musk.
28. **Sequoia Capital Fund, L.P.** Douglas Leone. Knowledgeable as an equity co-investor alongside Musk.
29. **Strauss Capital LLC.** Daniel Strauss. Knowledgeable as an equity co-investor alongside Musk.
30. **Tresser Blvd 402 LLC (Cartenna).** Peter Avellone. Knowledgeable as an equity co-investor alongside Musk.
31. **VyCapital.** Katja Lake, Daniel Schwarz. Knowledgeable as an equity co-investor alongside Musk.
32. **Witkoff Capital.** Zachary Witkoff. Knowledgeable as an equity co-investor alongside Musk.
33. **HRH Prince Alwaleed Bin Talal Bin Abdulaziz Alsaud (Kingdom).** Knowledgeable as an equity co-investor alongside Musk.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 2:

Subject to and without waiving the foregoing General Objections and specific objections, Defendants identify the additional entities as equity co-investors alongside Musk, who, as such, have knowledge of their equity investments:

34. **AJG Growth Fund, LLC**
35. **Bandera Partners, LLC**
36. **Debala Trust (aka Karim Hakimzadeh)**
37. **Eden Global Investments L.P.**
38. **GFNCI LLC**
39. **Manhattan Venture Partners X LLC**
40. **Opportunity Fund X, a Series of Factorial Funds I LLC**
41. **Qatar Holding LLC**
42. **Santo Lira LLC**
43. **Section 32 Fund 4, LP**
44. **Tomales Bay Capital CGF ZHR IX, LP**
45. **Tru Arrow Technology Partners CIV II, LP**
46. **Yuxiang (Robin) Ren**

SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 2:

Subject to and without waiving the foregoing General Objections and specific objections, Defendants identify the additional entities as having knowledge regarding the topics called for in this Interrogatory:

Knowledgeable as investors approached by Morgan Stanley on Defendants' behalf regarding an equity investment:

47. **Access Industries**
48. **Advent**

49. **Andrew Finn, Tim Urban, Quentin Koffey**
50. **Apollo**
51. **Aristotle Capital**
52. **ARK Investment Management LLC**
53. **Ashler Capital**
54. **Balyasny**
55. **BlackRock**
56. **Blackstone**
57. **Block.one (Michael Lubin)**
58. **BOND (Mary Meeker)**
59. **Boston Management/Eaton Vance**
60. **Brian Armstrong**
61. **Brinley Partners**
62. **California Regents**
63. **Capital Group**
64. **Carlyle**
65. **CDPQ**
66. **Centerbridge**
67. **Claire Group (Marcelo Claire)**
68. **ClearBridge**
69. **Clearlake**
70. **Coatue**
71. **Combs Enterprises**

72. **Cowbird Capital**
73. **CPPIB**
74. **Craft Ventures**
75. **D1 Capital**
76. **DaGrosa Capital Partners**
77. **Dash Wasserstein**
78. **Diameter**
79. **Dorilton Capital**
80. **Dragoneer**
81. **EL Acquisitions Steve Ellman**
82. **Emilio Masci**
83. **First Republic (Joe Gebbia)**
84. **Founders Fund**
85. **Francisco Partners**
86. **Frank McCourt**
87. **General Atlantic**
88. **General Catalyst**
89. **GIC**
90. **Gigafund**
91. **GoldenTree**
92. **Gregory Cohen (Rambleside)**
93. **Greycroft**
94. **Grok Ventures**

95. **GSAM**
96. **Guggenheim**
97. **Hellman & Friedman**
98. **Hither Creek Ventures (Zander Farkas)**
99. **HPS Partners**
100. **HRS Management**
101. **Iconiq**
102. **Insight**
103. **IVP**
104. **Jack Dorsey**
105. **Jill Smoller**
106. **John Catsimatidis**
107. **K5 Global (Michael Kives)**
108. **Ken Griffin**
109. **Ken Howery**
110. **Larry A Mizel**
111. **LAUNCH (Jason Calacanis)**
112. **Level Four LLC (Joe Rogan)**
113. **Liontree**
114. **Long View (Crown)**
115. **Lutetia Capital**
116. **Marc Benioff**
117. **Mark Cuban**

118. **Mayor Bloomberg (Willett Advisors)**
119. **Michael Pollack**
120. **Mirae**
121. **MSD Partners**
122. **MSIM Private**
123. **MSIM Public**
124. **Naval Ravikant**
125. **Nelk (John Shahidi)**
126. **Nikesh Arora**
127. **Nikko Asset Mgmt. (Americas)**
128. **Norges**
129. **North Fifth Services (Bill Ford)**
130. **Nuveen (TIAA)**
131. **Oaktree**
132. **OTPP**
133. **Owl Rock (Blue Owl)**
134. **Palm Tree Crew**
135. **Paradigm (Matt Huang)**
136. **Pegasus Ventures**
137. **Peltz**
138. **Pershing Square**
139. **PIMCO**
140. **Pomegranate (Clay Whitehead)**

141. **Prometheus**
142. **Red Apple Holdings, Inc.**
143. **Reid Hoffman**
144. **Reprogrammed Interchange LLC**
145. **Revere Capital**
146. **Revere Securities**
147. **Ross Gerber**
148. **Safra**
149. **Samuel Bankman-Fried (FTX)**
150. **Scott Nolan**
151. **Security Benefit**
152. **Senator**
153. **Sixth Street**
154. **Skip Capital**
155. **Skip Enterprises Pty Ltd**
156. **Snowdevil Capital / Thistledown (Matt Cowin)**
157. **Softbank**
158. **Southpoint Capital**
159. **S.P. Hinduja Private Bank Ltd**
160. **SRS Investment Mgmt.**
161. **T. Rowe Price**
162. **TCV**
163. **Teknecap**

164. **Thor Halvorsen**
165. **Thrive**
166. **Thrivent**
167. **TPG**
168. **UC Regents (Jagdeep Bachher)**
169. **University of Michigan**
170. **Veritas Capital**
171. **Viking Global**
172. **Warburg**
173. **Web3 Foundation**
174. **YLEM (Bastian Lehmann)**

Knowledgeable as, or about, actual or potential co-investors in the Equity Financing:

175. **Anthony Scaramucci**
176. **Ari Emanuel**
177. **Ben Silverman**
178. **Brian Kingston**
179. **Carlos Slim**
180. **David Sacks**
181. **Dickson Law**
182. **Endeavor**
183. **Glenn Fuhrman**
184. **Jason Calacanis**

185. **Joe Lonsdale**
186. **John Rose**
187. **Steve Jurvetson**
188. **Ken Griffin**
189. **Kimbal Musk**
190. **Lawrence J. Ellison**
191. **Navaid Farooq**
192. **Rick Polhemus**
193. **Satya Nadella**
194. **Sean Combs**
195. **Sean Lynch**
196. **Tamim Jabr**
197. **Thierry Breton**
198. **Will MacAskill**

INTERROGATORY NO. 3:

Identify all Persons with knowledge concerning any review or assessment conducted by You or on Your behalf (including without limitation any review or assessment conducted by or at the direction of Defendants' Advisors), whether before or after the date of the Merger Agreement, relating to (1) the prevalence of false or spam accounts or bots on the Twitter platform; or (2) Twitter's API or "firehose" data, including without limitation all experts, consultants, advisors, or other service providers that You and/or Defendants' Advisors contacted, consulted, or retained in connection with any such review or assessment.

RESPONSE TO INTERROGATORY NO. 3:

Defendants object to this Interrogatory as seeking information not relevant to the parties' claims and defenses. Defendants further object to this Interrogatory

because it seeks information protected from disclosure as attorney work product or under the attorney-client privilege. Defendants further object to this Interrogatory because it seeks information that may be the subject of expert testimony. Defendants will make expert disclosures at the appropriate time, as required by the applicable rules and any further stipulations of the parties or Orders of the Court.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 3:

Subject to and without waiving the foregoing General Objections and specific objections, Defendants identify the following persons and entities with knowledge regarding analysis performed on Defendants' behalf regarding the aforementioned topics: ToSomeone Inc. dba CounterAction (Trevor Davis and Andrew Therriault), Halo Privacy, Inc. (Mark Kearns, Seth Rodin, Kevin Casey, Dennis Duckworth), and Cyabra Strategy Inc. (Dan Brahmy, Yossef Daar, Ido Shraga). Defendants will make further expert disclosures regarding any underlying analysis at the appropriate time, as required by the applicable rules and stipulations of the parties or Orders of the Court.

SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 3:

Subject to and without waiving the foregoing General Objections and specific objections, Defendants state that Elon Musk and Jared Birchall communicated with and reviewed work produced by the entities and some or all of the individuals previously identified in response to this Interrogatory, and that Skadden, Arps, Slate,

Meagher & Flom LLP and Quinn Emanuel Urquhart & Sullivan LLP engaged, communicated with, and reviewed the work of the individuals and entities previously identified in response to this Interrogatory.

THIRD SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 3:

Subject to and without waiving the foregoing General Objections and specific objections, Defendants state Mike Ringler from Skadden, Arps, Slate, Meagher & Flom LLP and Alex Spiro, Andrew Rossman, Christopher Kercher, and Silpa Maruri from Quinn Emanuel Urquhart & Sullivan, LLP engaged, communicated with, and/or reviewed the work of the individuals and entities previously identified in response to this Interrogatory.

AS TO OBJECTIONS ONLY:

OF COUNSEL:

Alex Spiro
Andrew J. Rossman
Christopher D. Kercher
Silpa Maruri
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010
(212) 849-7000

/s/ Edward B. Micheletti
Edward B. Micheletti (ID No. 3794)
Lauren N. Rosenello (ID No. 5581)
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
One Rodney Square
P.O. Box 636
Wilmington, Delaware 19899-0636
(302) 651-3000

*Attorneys for Defendants and
Counterclaim-Plaintiffs
Elon R. Musk, X Holdings I, Inc.,
and X Holdings II, Inc.*

DATED: August 31, 2022

Exhibit D

From: Jaclyn Palmerson
Sent: Thursday, September 1, 2022 12:37 AM
To: BRWilson@wlrk.com
Cc: Kathryn Bonacorsi; Emily Kapur; Andrew J. Rossman; Alex Spiro; Christopher Kercher; Silpa Maruri; David Mader; Micheletti, Edward B; Rosenello, Lauren N; Matthew Fox; DEKirk@wlrk.com; kshannon@potteranderson.com; ckelly@potteranderson.com; jslights@wsgr.com; bsorrels@wsgr.com; wdsavitt@WLRK.com; SKEDdy@wlrk.com; RAMcLeod@wlrk.com; AReddy@wlrk.com; NBYavitz@wlrk.com; ALGoodman@wlrk.com; APSadinsky@wlrk.com
Subject: Twitter v. Musk
Attachments: 2022.09.01 - Letter from Mader.pdf

Dear Counsel:

Please see the attached correspondence.

Best,
Jackie

Jaclyn Palmerson
Associate
Quinn Emanuel Urquhart & Sullivan, LLP

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WRITER'S DIRECT DIAL NO.
(212) 849-7148

WRITER'S EMAIL ADDRESS
davidmader@quinnemanuel.com

September 1, 2022

VIA E-MAIL
BRWILSON@WLRK.COM

Bradley R. Wilson, Esq.
Wachtell, Lipton, Rosen & Katz
51 West 52nd Street
New York, NY 10019

Re: *Twitter, Inc. v. Elon R. Musk, et al.*, C.A. No. 2022-0613-KSJM (Del. Ch.)

Dear Counsel:

I write in response to your August 29, 2022 and August 30, 2022 letters regarding purported deficiencies in Defendants' document productions and interrogatory responses.

I. Plaintiff's August 29, 2022 Letter

A. Defendants' Response to Interrogatory No. 3

Plaintiff's August 29, 2022 letter states that "Defendants' response to Interrogatory No. 3 continues to fail to identify all natural persons with the specified knowledge, including in particular individual attorneys of the identified law firms." Defendants disagree that their response to Interrogatory No. 3 is in any way deficient. However, to resolve this issue, Defendants will serve a supplemental response to Interrogatory No. 3 listing the partners from the law firms previously disclosed who have knowledge regarding the reviews or assessments discussed in Interrogatory No. 3.

B. Defendants' Production of Data Scientist Analyses

Defendants intend to fully comply with the Court's August 25, 2022 Order. That Order clearly defined the Analyses that the Court found to have been put at issue and therefore not subject to the protection of Rule 26(b)(4)(B). Specifically, the Court defined the relevant "Analyses" as follows:

In May 2022, Defendants demanded information pursuant to Section 6.4 concerning Plaintiff's methods of calculating monetizable daily active usage or

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users (“mDAU”). In response, Plaintiff provided its “firehose” data—i.e., a live feed of data concerning public accounts on Plaintiff’s platform. Defendants then provided Plaintiff’s firehose data to the Data Scientists, who conducted a “preliminary analysis” of that data. Based expressly in part on that preliminary analysis, Defendants terminated the Merger Agreement on July 8, 2022. Plaintiff filed suit, and Defendants responded with counterclaims that reference analyses performed by the Data Scientists (with the preliminary analysis, the “Analyses”) at least eight times.

August 25, 2022 Order on Plaintiff’s Second Discovery Motion at 2 (footnotes omitted). Consistent with the Order, Defendants or their advisors (who have been subpoenaed) will produce the Analyses, together with documents and communications and drafts concerning the Analyses that do not contain any work product. If Defendants withhold any such documents, communications, or drafts on the basis that they contain or reflect work product, Defendants will provide a log.

II. Plaintiff’s August 30, 2022 Letter

A. Defendants’ Text Message Production

Defendants disagree with any suggestion that their collection, review, or production of text messages has been in any way deficient. At Plaintiff’s request, Defendants conducted a linear review of all text messages with any contact sent or received between May 3, 2022 and May 16, 2022, a counterparty-specific linear review, and a review of text messages that hit on agreed-upon search terms. At Plaintiff’s request, Defendants also reviewed all texts within an agreed-upon buffer period. After conducting this extensive review, Defendants produced over 1200 text messages from Mr. Musk and Mr. Birchall. Defendants’ document production—and, specifically, Defendants’ production of text messages—was substantially complete as of August 29. Plaintiff’s accusations that there are “just four text messages” on a certain day or “zero text messages” during a certain time period, in addition to being inaccurate, provide no support for Plaintiff’s suggestion that there are responsive texts that Defendants have failed to produce.¹

Nevertheless, Defendants will investigate Plaintiff’s complaints and, in the event any responsive texts are found to have been inadvertently withheld, they will be produced promptly. Defendants will also produce any text messages between Mr. Musk and Mr. Birchall that were previously produced from the custodial files of one and not the other, although we confirm that Plaintiff has at least one copy of every such text.

B. Defendants’ Rate of Production

As to your second point, Defendants have reviewed over 49,000 custodial documents after threading and deduping. During the course of our early meet and confers, we repeatedly advised you that Plaintiff’s search terms were not well tailored to result in the likely identification of non-duplicative responsive documents. The fact that our good faith observations were borne out by

¹ Defendants did, in fact, produce text messages from May 11, 2022.

the review should not be the basis for negative inferences. Nor is it surprising, given what we told you.

To take your example of the search string “MdaU* OR MAU* OR Dau* OR UAM OR mMAU,” Defendants’ review of documents hit on by that term revealed a significant number of irrelevant, nonresponsive hits, including unsolicited e-mails asking Mr. Musk for money, e-mails containing the word “daughter,” and image files that the keyword search tool reads as random strings of characters, which are likely to hit on short search terms with a wildcard at the end, like MAU* or Dau*. Other irrelevant, nonresponsive hits include employee rosters or other documents that contain employee names that hit on one or more of the common names Plaintiff requested as search terms, such as Martha*, Bret*, Taylor*, Jack*, and Marty*.

Further, we fail to understand why a responsiveness rate of “less than half” could be incomprehensible to you, given that your own review of documents hitting on the term “mDAU” (without a wildcard at the end) resulted in the exclusion of 76% of those documents from production. Indeed, such a substantial exclusion is far more surprising from Twitter, which uses the term “mDAU” extensively within its organization, than it is from Defendants.

Notwithstanding the above, you misstate our production figures by nearly 25%, since Defendants had in fact produced 2,065 documents as of August 29, 2022 (the date preceding that of your letter). Your calculations are therefore incorrect.

C. Defendants’ Interrogatory Responses

While Plaintiff complains that Defendants’ supplemental responses “identified only persons and entities Twitter already knew had relevant knowledge, and thus disclosed nothing,” Plaintiff is now asking Defendants to supplement their interrogatory responses based on text messages and other documents already within Plaintiff’s possession. Such supplements will, again, disclose nothing new. Further, while you suggest Defendants “omitted . . . Michael Kives of K5 Global,” Mr. Kives and his affiliation with K5 Global are clearly disclosed in Defendants’ interrogatory responses. *See* Second Supplemental Response to Interrogatory No. 1.

In any event, together with this letter, Defendants will serve amended interrogatory responses that Defendants trust will resolve Plaintiff’s concerns.

Defendants reserve all rights. We are available to discuss upon request.

Very truly yours,

/s/ David Mader

David Mader

Exhibit E

From: Kathryn Bonacorsi
Sent: Tuesday, August 30, 2022 11:49 PM
To: Wilson, Bradley R.
Cc: Silpa Maruri; Emily Kapur; Andrew J. Rossman; Alex Spiro; Christopher Kercher; David Mader; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP); Rosenello, Lauren N; Matthew Fox; Kirk, David E.; Shannon, Kevin R. (Potter Anderson & Corroon LLP); Kelly, Christopher N. (Potter Anderson & Corroon LLP); Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC); Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC); Savitt, William D.; Eddy, Sarah K.; McLeod, Ryan A.; Reddy, Anitha; Yavitz, Noah B.; Goodman, Adam L.; Sadinsky, Alexandra P.
Subject: RE: Twitter v. Musk
Attachments: 2022.08.30 Mader Letter.pdf

Counsel:

On behalf of Defendants, please see the attached correspondence.

Regards,
Kate

Kathryn Bonacorsi
Associate
Quinn Emanuel Urquhart & Sullivan, LLP

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WRITER'S DIRECT DIAL NO.
(212) 849-7148

WRITER'S EMAIL ADDRESS
davidmader@quinnemanuel.com

August 30, 2022

VIA E-MAIL
BRWILSON@WLRK.COM

Bradley R. Wilson, Esq.
Wachtell, Lipton, Rosen & Katz
51 West 52nd Street
New York, New York 10019

Re: Twitter, Inc. v. Elon R. Musk, et al., C.A. No. 2022-0613-KSJM (Del. Ch.)

Dear Counsel:

Yesterday at 4:05 p.m. Twitter represented that it had substantially completed its document production. Twitter's productions, however, reveal clear deficiencies that must be remedied immediately. We are continuing our review of Twitter's productions, including the more than 80,000 pages that Twitter has produced in the last two days *alone*, and we reserve our rights to raise additional deficiencies. We nevertheless give notice of the following deficiencies that must be rectified immediately.

First, it appears that Twitter is either withholding obviously relevant and responsive documents or has not in fact made a "substantially complete" production. For example, a comparison between Twitter's search term results and the materials it has produced reveal numerous obvious gaps in Twitter's production, including the following:

1. Twitter has produced only 4,144 documents hitting on the term "mDAU," even though, according to Twitter's hit count, 17,527 documents hit on that term. It is highly implausible that 76% of the documents hitting on the term "mDAU" fall outside the scope of what Twitter has agreed to produce, which includes "(1) Board-level documents concerning mDAU; (2) management-level documents concerning mDAU; (3) documents concerning Twitter's belief that mDAU is a key metric for Twitter; (4) documents concerning Twitter's disclosure of its mDAU metric; (5) documents concerning Twitter's spam-estimation process for the fourth quarter of 2021; (6) documents concerning the relationship between mDAU and Twitter's revenue or EBITDA; (7) Twitter's recast of its mDAU on April 28, 2022; (8) Twitter's criteria for determining whether an account is

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included in mDAU; (9) documents relating to the impact of mDAU on Twitter's performance metrics; and (10) communications with advertisers regarding the importance of mDAU and its impact on performance metrics." Please describe what nonprivileged documents Twitter has that use the term mDAU and which are being withheld as non-responsive.

2. Twitter has produced only 817 documents hitting on the term "UAM," even though, according to Twitter's hit count, 5,679 documents hit on that term. This tiny production is staggering, particularly given that the Court has ordered Twitter to produce all documents in Twitter's review database "reflecting discussion of any other key metric identified by Defendants." Indeed, even under Twitter's narrower articulation of responsiveness, which the Court has rejected, it is implausible that over 85% of documents containing the phrase "UAM" do not "*relate to* Twitter's belief that mDAU, and its related growth, is a key metric Twitter uses to measure success against its objectives and to show the size of its audience and engagement" or that those documents do not involve a comparison between the relative importance of mDAU and UAM. Please confirm when you intend to remedy this deficiency, which is in violation of the Court's August 25 Order.
3. Twitter has produced only 130 documents hitting on the term "stickiness," even though, according to Twitter's hit count, 945 documents hit on that term. Once again, it would be remarkable if more than 85% of the documents hitting on the term "stickiness"—which is a measure Twitter uses to measure the engagement levels of its mDAU—would not "*relate to* Twitter's belief that mDAU, and its related growth, is a key metric Twitter uses to measure success against its objectives and to show the size of its audience and engagement." Please explain the basis on which you have withheld more than eight hundred documents relating to this relevant term.
4. Twitter has produced only 107 documents hitting on the term "TYTT"—which is an acronym for "too young to tell," a phrase used to describe users counted in mDAU that are too new to be served any ads—even though, according to Twitter's hit count, 289 documents hit on that term. It is facially implausible that more than 50% of the documents hitting on the term "TYTT" would not "reflect[] Twitter's knowledge or awareness that its mDAU count includes accounts that were not served or rendered any ads on one or more days when said accounts were included in the mDAU count."

Further demonstrating the deficiency in Twitter's production, Twitter has to date produced fewer than 100 documents total from its 23 Cognizant custodians. It is simply not believable that more than twenty individual document custodians would collectively produce fewer than 100 documents, suggesting either that Twitter has not substantially completed its production of documents from the custodian files of these individuals, or that Twitter has not adequately located all sources of responsive materials for these custodians, or that Twitter has withheld relevant documents. So that we may more comprehensively assess the deficiency in Twitter's production with respect to these custodians, please provide hit counts for each and identify the total number of documents collected from each. Please also confirm when Twitter was first aware of the hit counts for these twenty-one custodians, and please describe the steps you have taken to identify relevant sources of responsive materials for each, including the identification of non-email sources

of relevant materials (e.g., Slack, email, text). Finally, we note that if there are in fact only 100 responsive documents from the Cognizant custodians, it is disturbing that in opposing Defendants' motion to compel on custodians Twitter touted its addition of these custodians without informing the Court that they only possessed a de minimis number of responsive documents.

Second, as we have already indicated, the volume of materials Twitter produced in the hours and days immediately preceding the substantial completion deadline demonstrates a manifest failure by Twitter to comply with its obligations under the Scheduling Order. As of the substantial completion deadline, Twitter had produced approximately 41,000 documents. Of those, more than 18,000 documents—representing more than 40% of the total production—were produced within one hour of the substantial completion deadline. More than 25,000 documents—representing approximately 60% of Twitter's total production—were produced on or after Saturday, August 27, two days before the substantial completion deadline. Moreover, Twitter appears to have intentionally held back many of the most relevant documents in its production until the end of the substantial completion period. For example, over 60% of the documents produced by Twitter that hit on the search term "mDAU," 80% of the documents that hit on the search term "UAM," 91% of the documents that hit on the search term "Stickiness," and 96% of the documents that hit on the search term "TYTT" were produced less than one hour before the substantial completion deadline. These delayed productions suggests that Twitter is attempting to deprive Defendants of a reasonable opportunity to review Twitter's documents in advance of depositions. We reserve all rights.

Third, with respect to the documents of Mr. Egon Durban in particular, Twitter's production contains only 10 custodial documents—none of them e-mails—and has produced fewer than 100 e-mails to or from Mr. Durban, all from the custodial files of other custodians. The production of only four e-mails sent by a document custodian is cause for concern, and it suggests that Mr. Durban was using other forms of communications to discuss the matters at issue in this litigation. Accordingly, we reiterate our earlier request that Twitter agree to produce text and other non-email messages for Mr. Durban. To the extent Twitter continues to refuse to produce Mr. Durban's texts and other non-email messages, please confirm that Mr. Durban's texts and other messages are in fact within Twitter's possession, custody, and control. Given that Twitter has previously agreed to collect documents from Mr. Durban's non-Twitter e-mail account, we assume that they are.

Finally, Twitter's productions raise significant concerns regarding the manner in which Twitter has collected responsive materials. For example, Twitter has applied inappropriate responsiveness redactions in contexts where responsiveness is apparent. Twitter has produced a Slack Channel titled "tmp-uam-discussions," (TWTR_000079793) which was explicitly set up to "consolidate[e] the various questions about UAM as a goaling metric for initiatives." Obviously, the entire substantive content of this channel is highly relevant to Defendants' counterclaims, yet more than half of the communications in this channel have been redacted as purportedly non-responsive. Although Defendants agreed to allow Twitter to redact portions of large Slack conversations that did not hit on any search terms (and were not in close proximity to any search terms), Defendants have not agreed to allow Twitter to intentionally withhold responsive information. The same is true of the "tundra-deal-team" Slack Channel (TWTR_000079519), which likewise has dozens of pages of communications redacted as non-responsive despite the

obvious relevance of the entire Slack Channel. Please confirm that you will produce these Channels without redaction.

In addition to Twitter's inappropriate responsiveness redactions, Twitter has produced, to date, only a handful of text messages in the form of screen shots, suggesting that Twitter has not conducted a forensically comprehensive collection and review of its custodians text messages. Please confirm that Twitter has collected all text messages from, at the very least, Twitter's six agreed text custodians, and that Twitter has reviewed all of those texts according to its proposed August 23, 2022 protocol. If Twitter has not done so, please immediately explain why it has not. Please confirm whether Twitter has completed its production of text messages. If not, please explain why it has not, identify the custodians whose text messages have not been produced, and state when the production of text messages will be complete. Defendants of course reserve all rights, including the right to postpone depositions and/or seek relief from the Court.

Given the existing discovery schedule, Defendants request answers to the points raised above by the close of business tomorrow.

Very truly yours,

A handwritten signature in blue ink, appearing to read "D. Mader", with a stylized flourish at the end.

David Mader

Exhibit F

From: Wilson, Bradley R. <BRWilson@wlrk.com>
Sent: Thursday, September 1, 2022 11:07 PM
To: Kathryn Bonacorsi
Cc: Silpa Maruri; Emily Kapur; Andrew J. Rossman; Alex Spiro; Christopher Kercher; David Mader; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP); Rosenello, Lauren N; Matthew Fox; Kirk, David E.; Shannon, Kevin R. (Potter Anderson & Corroon LLP); Kelly, Christopher N. (Potter Anderson & Corroon LLP); Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC); Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC); Savitt, William D.; Eddy, Sarah K.; McLeod, Ryan A.; Reddy, Anitha; Yavitz, Noah B.; Goodman, Adam L.; Sadinsky, Alexandra P.
Subject: RE: Twitter v. Musk

[EXTERNAL EMAIL from brwilson@wlrk.com]

Counsel,

We write in partial response to your August 30 letter.

In that letter, defendants raise concerns about certain redactions for responsiveness in Slack channels titled “tmp-uam-discussions” and “tundra-deal-team.”

- As to the tmp-uam-discussions Slack channel, because Twitter conducted its review of this document before the Court’s Order on Defendants’ Second Discovery Motion, not all messages discussing the UAM metric were identified as responsive by the reviewers. We advised you of this issue in an email sent on August 25, and offered to re-review any Slack channels we had gathered that contained the term “UAM” (among other terms) and modify the responsiveness redactions to take account of the Court’s Order. However, we explained in that email that “[o]ur willingness to do this is subject to the condition that it be understood that changing our responsiveness criteria for Slack messages in the midst of our review will result in Twitter producing a smaller number of Slack messages prior to the substantial completion deadline,” and accordingly asked defendants to “let us know by tomorrow [i.e. August 26] whether defendants would like us to re-review Slack messages in this manner.” Defendants did not get back to us on this inquiry, and thus Twitter produced this Slack channel without undertaking the re-review it had offered. Nevertheless, we have now re-reviewed the tmp-uam-discussions Slack channel in light of your letter, and we are producing this evening a replacement version that takes account of the Court’s Order.
- We likewise undertook to re-review the tundra-deal-team Slack channel after receiving your letter. Having done so, we agree that given the subject matter of the Slack channel, the responsiveness redactions were applied in error. We are therefore producing this evening a replacement version that will contain only privilege-based redactions.

We will endeavor to respond to the other issues raised in your August 30 letter tomorrow, as we previously advised.

Regards,
Brad

From: Wilson, Bradley R.

Sent: Thursday, September 1, 2022 8:24 AM

To: Kathryn Bonacorsi <kathrynbbonacorsi@quinnemanuel.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Rossman, Andrew J. (Quinn Emanuel Urquhart & Sullivan LLP) <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Kercher, Christopher D. (Quinn Emanuel Urquhart & Sullivan LLP) <christopherkercher@quinnemanuel.com>; Mader, David S. (Quinn Emanuel Urquhart & Sullivan LLP) <davidmader@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Kirk, David E. <DEKirk@wlrk.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SKEddy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBVavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>

Subject: RE: Twitter v. Musk

Counsel,

We are preparing a response to your August 30 letter. We expect to send it tomorrow.

Regards,
Brad

From: Kathryn Bonacorsi <kathrynbbonacorsi@quinnemanuel.com>

Sent: Tuesday, August 30, 2022 11:49 PM

To: Wilson, Bradley R. <BRWilson@wlrk.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Rossman, Andrew J. (Quinn Emanuel Urquhart & Sullivan LLP) <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Kercher, Christopher D. (Quinn Emanuel Urquhart & Sullivan LLP) <christopherkercher@quinnemanuel.com>; Mader, David S. (Quinn Emanuel Urquhart & Sullivan LLP) <davidmader@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Kirk, David E. <DEKirk@wlrk.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SKEddy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBVavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>

Subject: RE: Twitter v. Musk

*** EXTERNAL EMAIL ***

Counsel:

On behalf of Defendants, please see the attached correspondence.

Regards,
Kate

Kathryn Bonacorsi
Associate
Quinn Emanuel Urquhart & Sullivan, LLP

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Thank you in advance for your cooperation and assistance.
=====

Exhibit G

From: Wilson, Bradley R. <BRWilson@wlrk.com>
Sent: Friday, September 2, 2022 9:01 PM
To: Kathryn Bonacorsi
Cc: Silpa Maruri; Emily Kapur; Andrew J. Rossman; Alex Spiro; Christopher Kercher; David Mader; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP); Rosenello, Lauren N; Matthew Fox; Kirk, David E.; Shannon, Kevin R. (Potter Anderson & Corroon LLP); Kelly, Christopher N. (Potter Anderson & Corroon LLP); Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC); Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC); Savitt, William D.; Eddy, Sarah K.; McLeod, Ryan A.; Reddy, Anitha; Yavitz, Noah B.; Goodman, Adam L.; Sadinsky, Alexandra P.
Subject: RE: Twitter v. Musk
Attachments: BRW letter to David S. Mader (9.2.2022).pdf

[EXTERNAL EMAIL from brwilson@wlrk.com]

Counsel,

Please see the attached letter.

Regards,
Brad

From: Wilson, Bradley R.
Sent: Thursday, September 1, 2022 11:07 PM
To: 'Kathryn Bonacorsi' <kathrynbonacorsi@quinnemanuel.com>
Cc: 'Silpa Maruri' <silpamaruri@quinnemanuel.com>; 'Emily Kapur' <emilykapur@quinnemanuel.com>; Rossman, Andrew J. (Quinn Emanuel Urquhart & Sullivan LLP) <andrewrossman@quinnemanuel.com>; 'Alex Spiro' <alexspiro@quinnemanuel.com>; Kercher, Christopher D. (Quinn Emanuel Urquhart & Sullivan LLP) <christopherkercher@quinnemanuel.com>; Mader, David S. (Quinn Emanuel Urquhart & Sullivan LLP) <davidmader@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; 'Rosenello, Lauren N' <Lauren.Rosenello@skadden.com>; 'Matthew Fox' <matthewfox@quinnemanuel.com>; Kirk, David E. <DEKirk@wlrk.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SEddy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBYavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>
Subject: RE: Twitter v. Musk

Counsel,

We write in partial response to your August 30 letter.

In that letter, defendants raise concerns about certain redactions for responsiveness in Slack channels titled "tmp-uam-discussions" and "tundra-deal-team."

- As to the tmp-uam-discussions Slack channel, because Twitter conducted its review of this document before the Court's Order on Defendants' Second Discovery Motion, not all messages discussing the UAM metric were identified as responsive by the reviewers. We advised you of this issue in an email sent on August 25, and offered to re-review any Slack channels we had gathered that contained the term "UAM" (among other terms) and modify the responsiveness redactions to take account of the Court's Order. However, we explained in that email that "[o]ur willingness to do this is subject to the condition that it be understood that changing our responsiveness criteria for Slack messages in the midst of our review will result in Twitter producing a smaller number of Slack messages prior to the substantial completion deadline," and accordingly asked defendants to "let us know by tomorrow [i.e. August 26] whether defendants would like us to re-review Slack messages in this manner." Defendants did not get back to us on this inquiry, and thus Twitter produced this Slack channel without undertaking the re-review it had offered. Nevertheless, we have now re-reviewed the tmp-uam-discussions Slack channel in light of your letter, and we are producing this evening a replacement version that takes account of the Court's Order.
- We likewise undertook to re-review the tundra-deal-team Slack channel after receiving your letter. Having done so, we agree that given the subject matter of the Slack channel, the responsiveness redactions were applied in error. We are therefore producing this evening a replacement version that will contain only privilege-based redactions.

We will endeavor to respond to the other issues raised in your August 30 letter tomorrow, as we previously advised.

Regards,
Brad

From: Wilson, Bradley R.

Sent: Thursday, September 1, 2022 8:24 AM

To: Kathryn Bonacorsi <kathrynbbonacorsi@quinnemanuel.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Rossman, Andrew J. (Quinn Emanuel Urquhart & Sullivan LLP) <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Kercher, Christopher D. (Quinn Emanuel Urquhart & Sullivan LLP) <christopherkercher@quinnemanuel.com>; Mader, David S. (Quinn Emanuel Urquhart & Sullivan LLP) <davidmader@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Kirk, David E. <DEKirk@wlrk.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SKEDdy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBAYavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>

Subject: RE: Twitter v. Musk

Counsel,

We are preparing a response to your August 30 letter. We expect to send it tomorrow.

Regards,
Brad

From: Kathryn Bonacorsi <kathrynbonacorsi@quinnemanuel.com>
Sent: Tuesday, August 30, 2022 11:49 PM
To: Wilson, Bradley R. <BRWilson@wlrk.com>
Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Rossman, Andrew J. (Quinn Emanuel Urquhart & Sullivan LLP) <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Kercher, Christopher D. (Quinn Emanuel Urquhart & Sullivan LLP) <christopherkercher@quinnemanuel.com>; Mader, David S. (Quinn Emanuel Urquhart & Sullivan LLP) <davidmader@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Kirk, David E. <DEKirk@wlrk.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SEddy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBYavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>
Subject: RE: Twitter v. Musk

*** EXTERNAL EMAIL ***

Counsel:

On behalf of Defendants, please see the attached correspondence.

Regards,
Kate

Kathryn Bonacorsi
Associate
Quinn Emanuel Urquhart & Sullivan, LLP

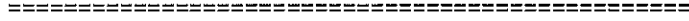
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Thank you in advance for your cooperation and assistance.



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September 2, 2022

BY EMAIL

David S. Mader, Esq.
Quinn Emanuel Urquhart & Sullivan, LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010

Re: *Twitter, Inc. v. Musk, et al.*, C.A. No. 2022-0613-KSJM (Del. Ch.)

Dear Mr. Mader:

We write in response to your letter of August 30, which addressed certain purported deficiencies in Twitter's document production.

Your assertion that Twitter's document production is not substantially complete is unfounded and inaccurate. Twitter has produced more than 41,000 documents over the past month—including approximately 37,000 documents from custodial and centralized electronic files. Twitter's production rate of such files (as a percentage of the documents reviewed) is approximately 17%. Defendants, by contrast, have produced just 1,660 custodial documents, with a responsiveness rate of roughly 3%.

David S. Mader, Esq.
September 2, 2022
Page 2

Your claim that Twitter failed to comply with the rolling production requirement in the Scheduling Order is also meritless. Twitter devoted significant resources to its collection and review effort and worked in good faith to meet the substantial completion deadline, making more than a dozen productions along the way. The fact that Twitter made a large production on the day of the substantial completion deadline is neither surprising nor improper. Rather, it is a necessary byproduct of highly expedited litigation and entirely common in the Court of Chancery.

We turn now to the specific deficiencies that your letter identified:

First, with regard to Twitter's production of documents containing the term "mDAU," your statement in the August 30 letter that only 4,144 documents containing this term were deemed responsive is inaccurate. Twitter has produced more than 4,600 documents that contain the term "mDAU." Your calculation also fails to account for documents Twitter is withholding on privilege grounds, which will be reflected on Twitter's forthcoming privilege log.

The reality is that Twitter has deemed responsive more than 40% of the documents that contain this term. This responsiveness rate aligns with reasonable expectations: Given the Court's Order on Defendants' Second Discovery Motion, not all documents that reference the term "mDAU" are required to be produced.

To test Twitter's responsiveness determinations on documents containing the term "mDAU," we reviewed a random sampling of documents containing that term that had been coded non-responsive. Most of the documents in the sample had been properly designated, but the sample did include a small number of documents that, although immaterial, are technically responsive. We are investigating this issue further and will provide an update over the weekend.

Second, with regard to Twitter's production of documents containing the term "UAM," your letter was premature. Twitter expects to produce by tomorrow a significant number of additional "UAM" documents, in accordance with the Court's Order on Defendants' Second Discovery Motion.

Third, with regard to Twitter's production of documents containing the term "stickiness," we expect that additional documents containing this term will be produced by tomorrow as part of Twitter's production of documents in response to the Court's Order on Defendants' Second Discovery Motion.

Fourth, with regard to Twitter's production of documents containing the term "TYTT," your understanding of this acronym is mistaken: It does not refer to accounts that "are too new to be served any ads." Aug. 30 Letter at 2. As you know, defendants served a specific document request targeting TYTT accounts. In its response to this request, Twitter agreed to produce non-privileged documents that concern the "treatment of TYTT accounts in connection with the mDAU Audit for Q4 2021, or the actual or potential discussion of TYTT accounts with Defendants in connection with the Merger Agreement." See Response to Request No. 1, Plaintiff's Responses and Objections to Defendants' Revised Second Requests for Production of

David S. Mader, Esq.
September 2, 2022
Page 3

Documents Directed to Twitter, Inc. (Aug. 19, 2022). Twitter has endeavored to produce such documents, and defendants have made no colorable showing that the production is deficient.

Fifth, with regard to the “Cognizant custodians”—whose emails were searched for the period November 1, 2021 to January 14, 2022, in accordance with our agreement on the email search protocol—our calculations indicate that Twitter has produced approximately 260 documents from their files, out of a total of approximately 4,600 such documents in the review population. Insofar as these individuals’ work on the mDAU Audit was only a small portion of the work they did for Twitter, these figures are not entirely surprising. Nevertheless, Twitter is investigating this issue further and will revert in prompt due course.

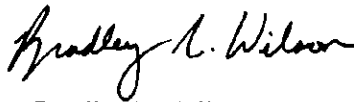
In response to your inquiries regarding non-email document sources for these custodians, as you know, Twitter did not agree to collect or review Slack messages or text messages for the Cognizant custodians. This issue is currently pending before the Court as it pertains to Slack messages.

Sixth, with regard to Twitter’s production of documents from Mr. Durban’s Silver Lake email account, your letter was premature. Twitter has now substantially completed its production of documents from that email account.

We do not agree to add Mr. Durban as a Messaging Platform Custodian and review and produce his text messages. As you know, we reached an impasse on that issue more than a week ago.

Finally, we do not understand the basis for the assertion in your letter that Twitter has produced only a “handful” of texts. Twitter has produced hundreds of text messages from its Messaging Platform Custodians, all in accordance with Twitter’s August 23 Message Protocol. Twitter expects to make a final production of text messages from these custodians tomorrow.¹

Sincerely,



Bradley R. Wilson


¹ We responded separately yesterday to the concerns you raised in the August 30 letter about certain Slack channels in Twitter’s production.

Exhibit H

Date	Content	Sender	Participants
2022-01-21 23:09:53 (CST)	Eion - are you able to access your Twitter account ok? I saw a number of emails held in spam. Including some password resets attempts	Alex Stillings	Alex Stillings, Self
2022-01-21 23:17:30 (CST)	I haven't tried recently	Self	Alex Stillings, Self
2022-01-21 23:17:41 (CST)	Am staying off twitter	Self	Alex Stillings, Self
2022-01-21 23:17:59 (CST)	Is my twitter account posting anything?	Self	Alex Stillings, Self
2022-01-21 23:19:31 (CST)	Not posting but I see one deactivation email and a dozen password reset emails. Assuming this is a scammer attempt but wanted to check to ensure you still had access to your Twitter	Alex Stillings	Alex Stillings, Self
2022-01-21 23:19:52 (CST)	It is someone trying to hack my twitter	Self	Alex Stillings, Self
2022-01-21 23:20:05 (CST)	But I have two-factor enabled with the confirmation app	Self	Alex Stillings, Self
2022-01-21 23:21:43 (CST)	OK, great to hear.	Alex Stillings	Alex Stillings, Self
2022-01-24 19:18:07 (CST)	Yes - FaceTimed with them to confirm my identity(hah) and they are hopefully gonna reset your 2FA to SMS soon. Asking for an update now	Alex Stillings	Alex Stillings, Self
2022-01-24 19:21:36 (CST)	Sounds good	Self	Alex Stillings, Self
2022-01-24 19:21:47 (CST)	I can also FaceTime with them if still a problem	Self	Alex Stillings, Self
2022-01-24 20:03:55 (CST)	Tldr; your account is considered high profile internally over there. So they've made it very hard to make changes like this by their teams. They are working through it...	Alex Stillings	Alex Stillings, Self
2022-01-24 20:05:28 (CST)	Happy to FaceTime directly	Self	Alex Stillings, Self
2022-01-24 20:13:38 (CST)	Not sure how I was able to make Twitter work on this new phone, as I didn't use the backup code.	Self	Alex Stillings, Self
2022-01-24 20:14:43 (CST)	Connecting with their head of Trust & Safety now	Alex Stillings	Alex Stillings, Self
2022-01-24 20:14:59 (CST)	I assume we used your old phone to verify the new, once upon a time	Alex Stillings	Alex Stillings, Self
2022-01-24 20:38:37 (CST)	Oh yeah	Self	Alex Stillings, Self
2022-01-24 20:57:33 (CST)	They can fix it by disabling all 2FA for your account which will let you in and then you can re-enable it. Are you available in 90 mins to have them coordinate it?	Alex Stillings	Alex Stillings, Self
2022-01-24 20:58:09 (CST)	Liked "They can fix it by disabling all 2FA for your account which will let you in and then you can re-enable it. Are you available in 90 mins to have them coordinate it?"	Self	Alex Stillings, Self
2022-01-24 21:07:11 (CST)	I know things are in flux right now, but is EMDesk SpaceX still your primary calendar? I realize there a meeting on there in 1 hour. In case I should move this twitter fix out a bit.	Alex Stillings	Alex Stillings, Self
2022-01-24 21:35:41 (CST)	Yeah	Self	Alex Stillings, Self

2022-01-24 21:36:08 (CST)	But I can step off the call briefly to FaceTime them if need be Sounds good. And ideally I'm just texting you to sign in once they disable 2FA and then you can immediately sign in and re-enable. No FaceTime needed.	Self ([REDACTED])	Alex Stillings ([REDACTED]), Self ([REDACTED])
2022-01-24 21:40:48 (CST)	Liked "Sounds good. And ideally I'm just texting you to sign in once they disable 2FA and then you can immediately sign in and re-enable. No FaceTime needed."	Alex Stillings ([REDACTED])	Alex Stillings ([REDACTED]), Self ([REDACTED])
2022-01-24 21:58:28 (CST)	Elon- we are ready to make the change if you are	Self ([REDACTED])	Alex Stillings ([REDACTED]), Self ([REDACTED])
2022-01-24 22:33:16 (CST)	Liked "Elon- we are ready to make the change if you are"	Alex Stillings ([REDACTED])	Alex Stillings ([REDACTED]), Self ([REDACTED])
2022-01-24 22:35:02 (CST)	2FA disabled. Please try to log in now	Self ([REDACTED])	Alex Stillings ([REDACTED]), Self ([REDACTED])
2022-01-24 22:40:56 (CST)	Able to get back in ok?	Alex Stillings ([REDACTED])	Alex Stillings ([REDACTED]), Self ([REDACTED])
2022-01-24 22:50:51 (CST)	Liked "Able to get back in ok?"	Self ([REDACTED])	Alex Stillings ([REDACTED]), Self ([REDACTED])
2022-01-24 22:51:39 (CST)	And once in you can enable 2FA Settings > Security and account access > Security > 2FA	Alex Stillings ([REDACTED])	Alex Stillings ([REDACTED]), Self ([REDACTED])
2022-01-24 22:51:47 (CST)	App only is suggested	Alex Stillings ([REDACTED])	Alex Stillings ([REDACTED]), Self ([REDACTED])
2022-01-24 22:55:33 (CST)	Thanks!	Self ([REDACTED])	Alex Stillings ([REDACTED]), Self ([REDACTED])
2022-01-24 23:00:29 (CST)	And reminder to save that backup code 👍	Alex Stillings ([REDACTED])	Alex Stillings ([REDACTED]), Self ([REDACTED])
2022-01-24 23:13:08 (CST)	Liked "And reminder to save that backup code 👍"	Self ([REDACTED])	Alex Stillings ([REDACTED]), Self ([REDACTED])
2022-03-05 02:06:44 (CST)	Wow...I saw your tweet re free speech. WTF is going on Elon... EU passed a law banning Russia Today and several other Russian news sources. We have been told to block their IP address.	Antonio Gracias ([REDACTED])	Antonio Gracias ([REDACTED]), Self ([REDACTED])
2022-03-05 02:07:43 (CST)	Actually, I find their news quite entertaining	Self ([REDACTED])	Antonio Gracias ([REDACTED]), Self ([REDACTED])
2022-03-05 02:08:02 (CST)	Lot of bullshit, but some good points too	Self ([REDACTED])	Antonio Gracias ([REDACTED]), Self ([REDACTED])
2022-03-05 02:08:35 (CST)	This is fucking nuts...you are totally right. I 100% agree with you.	Self ([REDACTED])	Antonio Gracias ([REDACTED]), Self ([REDACTED])
2022-03-05 02:08:50 (CST)	We should allow it precisely bc we hate it....that is the ping of the American constitution.	Antonio Gracias ([REDACTED])	Antonio Gracias ([REDACTED]), Self ([REDACTED])
2022-03-05 02:09:39 (CST)	Exactly	Self ([REDACTED])	Antonio Gracias ([REDACTED]), Self ([REDACTED])
2022-03-05 02:09:47 (CST)	Free speech matters most when it's someone you hate spouting what you think is bullshit. I am 100% with you Elon. To the fucking mattresses no matter whatthis is a principle we need to fucking defend with our lives or we are lost to the darkness.	Self ([REDACTED])	Antonio Gracias ([REDACTED]), Self ([REDACTED])
2022-03-05 02:10:02 (CST)		Self ([REDACTED])	Antonio Gracias ([REDACTED]), Self ([REDACTED])
2022-03-05 02:11:30 (CST)		Antonio Gracias ([REDACTED])	Antonio Gracias ([REDACTED]), Self ([REDACTED])

2022-03-05 02:12:38 (CST)	Sorry for the swearing. I am getting excited.	Antonio Gracias	Antonio Gracias	Self
2022-03-05 02:12:55 (CST)	Loved "I am 100% with you Elon. To the fucking mattresses no matter whatthis is a principle we need to fucking defend with our lives or we are lost to the darkness."	Self	Antonio Gracias	Self
2022-03-24 12:39:20 (CDT)	Can you buy Twitter and then delete it, please!? xx	TJ	TJ	Self
2022-03-24 12:40:30 (CDT)	America is going INSANE.	TJ	TJ	Self
2022-03-24 12:43:38 (CDT)	The Babylon Bee got suspension is crazy. Raiyah and I were talking about it today. It was a fucking joke. Why has everyone become so puritanical?	TJ	TJ	Self
2022-03-24 12:45:02 (CDT)	Or can you buy Twitter and make it radically free-speech?	TJ	TJ	Self
2022-03-24 12:45:29 (CDT)	So much stupidity comes from Twitter xx	TJ	TJ	Self
2022-03-24 12:52:14 (CDT)	Maybe buy it and change it to properly support free speech xx	Self	Self	Self
2022-03-24 12:52:21 (CDT)	Liked "Or can you buy Twitter and make it radically free-speech? "	Self	Self	Self
2022-03-24 12:57:06 (CDT)	I love your "Twitter algorithm should be open source" tweet - I'm actually speaking to over 100 members of congress tomorrow at the GOP policy retreat and this is one of the ideas I'm pushing for reigning in crazy big tech. Now I can cite you so I'll sound less crazy myself.). Our public squares need to not have arbitrary sketchy censorship.	Joe Lonsdale	Joe Lonsdale	Self
2022-03-24 13:01:50 (CDT)	I honestly think social media is the scourge of modern life, and the worst of all is Twitter, because it's also a news stream as well as a social platform, and so has more real-world standing than Tik Tok etc. But it's very easy to exploit and is being used by radicals for social engineering on a massive scale. And this shit is infecting the world. Please do do something to fight woke-ism. I will do anything to help! xx	TJ	TJ	Self
2022-03-24 13:12:11 (CDT)	Liked "I love your "Twitter algorithm should be open source" tweet - I'm actually speaking to over 100 members of congress tomorrow at the GOP policy retreat and this is one of the ideas I'm pushing for reigning in crazy big tech. Now I can cite you so I'll sound less crazy myself.). Our public squares need to not have arbitrary sketchy censorship."	Self	Joe Lonsdale	Self
2022-03-24 13:12:15 (CDT)	Absolutely	Self	Joe Lonsdale	Self
2022-03-24 13:12:31 (CDT)	What we have right now is hidden corruption!	Self	Joe Lonsdale	Self
2022-03-24 13:12:37 (CDT)	Loved "What we have right now is hidden corruption!"	Self	Joe Lonsdale	Self
2022-03-26 18:12:00 (CDT)	Yes, a new platform is needed. It can't be a company. This is why I left. https://twitter.com/elonmusk/status/150777913042571267?s=20&t=8z3h0h0IG5ntB6Zuxd	jack jack	jack jack	Self
2022-03-26 18:12:02 (CDT)	5LW6	jack jack	jack jack	Self
2022-03-26 20:13:30 (CDT)	Ok	Self	Self	Self
2022-03-26 20:13:46 (CDT)	What should it look like?	Self	Self	Self
2022-03-26 20:52:31 (CDT)	I believe it must be an open source protocol, funded by a foundation of sorts that doesn't own the protocol, only advances it. A bit like what Signal has done. It can't have an advertising model. Otherwise you have surface area that governments and advertisers will try to influence and control. If it has a centralized entity behind it, it will be attacked. This isn't complicated work, it just has to be done right so it's resilient to what has happened to twitter.	jack jack	jack jack	Self
2022-03-26 20:58:04 (CDT)	Super interesting idea	Self	Self	Self

2022-03-26 21:00:35 (CDT)	I'm off the twitter board mid May and then completely out of company. I intend to do this work and fix our mistakes. Twitter started as a protocol. It should have never been a company. That was the original sin.	jack jack Self	jack jack jack jack	Self Self
2022-03-26 21:01:24 (CDT)	I'd like to help if I am able to	jack jack	jack jack	Self
2022-03-26 21:03:23 (CDT)	I wanted to talk with you about it after I was all clear, because you care so much, get it's importance, and could def help in immeasurable ways. Back when we had the activist come in, I tried my hardest to get you on our board, and our board said no. That's about the time I needed to work to leave, as hard as it was for me.	jack jack	jack jack	Self
2022-03-26 21:20:42 (CDT)	Loved "I wanted to talk with you about it after I was all clear, because you care so much, get it's importance, and could def help in immeasurable ways. Back when we had the activist come in, I tried my hardest to get you on our board, and our board said no. That's about the time I needed to work to leave, as hard as it was for me."	Self	jack jack	Self
2022-03-26 21:34:59 (CDT)	Do you have a moment to talk?	Self	jack jack	Self
2022-03-26 21:38:50 (CDT)	Bout to head out to dinner but can for a minute	jack jack	jack jack	Self
2022-03-26 21:51:53 (CDT)	I think the main reason is the board is just super risk averse and saw adding you as more risk, which I thought was completely stupid and backwards, but I only had one vote, and 3% of company, and no dual class shares. Hard set up. We can discuss more.	Self	jack jack	Self
2022-03-26 21:53:17 (CDT)	Let's definitely discuss more	Self	jack jack	Self
2022-03-26 21:54:23 (CDT)	I think it's worth both trying to move Twitter in a better direction and doing something new that's decentralized	jack jack	jack jack	Self
2022-03-26 21:55:30 (CDT)	It's likely the best option. I just have doubts. But open	jack jack	jack jack	Self
2022-03-26 21:55:50 (CDT)	Liked "It's likely the best option. I just have doubts. But open"	Self	jack jack	Self
2022-03-26 22:48:57 (CDT)	This is Elon. Please call when you have a moment.	Self	Egon Durban	Self
2022-03-26 22:49:14 (CDT)	It is regarding the Twitter board.	Self	Egon Durban	Self
2022-03-27 02:06:17 (CDT)	Elon, I'd like to chat with you in the next day or so... I do think we need another Twitter 	Larry Ellison	Larry Ellison	Self
2022-03-27 02:47:25 (CDT)	Want to talk now?	Self	Egon Durban	Self
2022-03-27 09:05:19 (CDT)	Have follow - up. Let's chat today whenever convenient for you.	Egon Durban	Larry Ellison	Self
2022-03-27 12:56:20 (CDT)	Sure.	Larry Ellison	Egon Durban	Self
2022-03-27 15:01:12 (CDT)	Hi everyone Parag (Ceo), Bret (Chairman) and Martha (head of gov) - You are connected w Elon. He is briefed on my conversations w you. Elon - everyone excited about prospect of you being involved and on board. Next step is for you to chat w three of them so we can move this forward quickly. Maybe we can get this done next few days	Egon Durban	Egon Durban, Martha Twitter, NomGov, Parag	Self
2022-03-27 15:01:55 (CDT)	Thanks Egon	Self	Egon Durban, Martha Twitter, NomGov, Parag	Self
2022-03-27 15:13:20 (CDT)	This is Bret Taylor. Let me know when you have a minute to speak today. Just got off with Parag and I know he is eager to speak with you today as well. Flexible all day	Bret Taylor	Bret Taylor	Self

2022-03-27 15:14:18 (CDT)	Later tonight would work – maybe 7pm? I have a minor case of Covid, so am a little under the weather.	Self	Bret Taylor Egon Durban NomGov Parag Self	Self Martha Twitter Bret Taylor Self
2022-03-27 15:14:24 (CDT)	Hey Elon - great to be connected directly. Would love to chat!	Parag		
2022-03-27 15:15:18 (CDT)	Sorry to hear — it can knock you out. 7pm sounds great	Bret Taylor	Bret Taylor	Self
2022-03-27 15:15:24 (CDT)	Liked "Sorry to hear — it can knock you out. 7pm sounds great"	Self	Bret Taylor	Self
2022-03-27 15:19:28 (CDT)	Would love to talk. Please let me know what time works - I'm super flexible. -Parag	Parag	Parag	Self
2022-03-27 15:21:50 (CDT)	Perhaps tonight around 8?	Self	Parag	Self
2022-03-27 15:22:27 (CDT)	That works! Look forward to talking.	Parag	Parag	Self
2022-03-27 15:22:35 (CDT)	Liked "That works! Look forward to talking."	Self	Parag	Self
2022-03-27 21:29:43 (CDT)	Hi E ,Pain settling down? Time for a latter-day Guttenburg to bring back free speech and buy Twitter .	Dr Jabour	Dr Jabour	Self
2022-03-27 22:02:27 (CDT)	Just finishing a Tesla Autopilot engineering call	Self	Parag	Self
2022-03-27 22:02:59 (CDT)	Liked "Just finishing a Tesla Autopilot engineering call"	Parag	Parag	Self
2022-03-29 08:12:21 (CDT)	Hey - I saw your poll on twitter about Twitter and free speech. I'm not sure if this is what's on your mind, but my collaborator Sam Bankman-Fried (https://www.forbes.com/profile/sam-bankman-fried/?sh=5b254fbf4449) has for a while been potentially interested in purchasing it and then making it better for the world. If you want to talk with him about a possible joint effort in that direction, his number is [redacted] and he's on Signal.	Will MacAskill	Will MacAskill	Self
2022-03-29 11:33:00 (CDT)	Hey Elon, I'm Martha chair of Twitter nomgov - know you've talked to Bret and parag - keen to have a chat when you have time - im in Europe (also hope covid not too horrible as I hear you have it)	Martha Twitter NomGov	Martha Twitter NomGov	Self
2022-03-29 21:24:32 (CDT)	Does he have huge amounts of money?	Self	Will MacAskill	Self
2022-03-30 11:22:26 (CDT)	Look forward to meeting soon! Can you let us know when you are able to meet in the Bay Area in the next couple of days?	Parag	Bret Taylor Self	Parag
2022-03-30 14:54:37 (CDT)	Why don't you buy Twitter? We run it for you. And establish a true platform of free speech. Would be a real contribution to democracy.	Mathias Döpfner	Mathias Döpfner	Self
2022-03-30 14:58:12 (CDT)	Interesting idea	Self	Mathias Döpfner	Self
2022-03-30 15:03:38 (CDT)	I'm serious. It's doable. Will be fun.	Mathias Döpfner	Mathias Döpfner	Self
2022-03-30 16:59:54 (CDT)	Hey Elon, I'm Martha chair of Twitter nomgov - know you've talked to Bret and parag - I'm v keen to have a chat when you have time - im in Europe but will make anything work	Martha Twitter NomGov	Egon Durban NomGov Parag	Martha Twitter Bret Taylor Self

2022-03-30 17:08:34 (CDT)	Sounds good. Perhaps a call late tonight central time works? I'm usually up until ~3am. Depends on how you define "huge"! He's worth \$24B, and his early employees (with shared values) bump that to \$30B. I asked about how much he could in principle contribute and he said: "\$1-3b would be easy" ~\$3-8b I could do ~\$8-15b is maybe possible but would require financing"	Self	Egon Durban NomGov Parag	Martha Twitter Bret Taylor Self
2022-03-30 17:33:40 (CDT)	If you were interested to discuss the idea I asked and he said he'd be down to meet you in Austin	Will MacAskill	Will MacAskill	Self
2022-03-30 17:34:40 (CDT)		Will MacAskill	Will MacAskill	Self
2022-03-30 17:36:07 (CDT)	He's based in the Bahamas normally. And I might visit Austin next week, if you'd be around?	Will MacAskill	Egon Durban	Martha Twitter
2022-03-30 21:03:48 (CDT)	if ok with you I'll try you 10am CET (1am PST) looking forward to meeting you	Martha Twitter	Parag	Self
2022-03-30 23:14:35 (CDT)	Sure	Self	Egon Durban NomGov Parag	Martha Twitter Bret Taylor Self
2022-03-31 00:09:56 (CDT)	I land in San Jose tomorrow around 2pm and depart around midnight. My Tesla meetings are flexible, so I can meet anytime in those 10 hours.	Self	Bret Taylor Self	Parag
2022-03-31 01:20:28 (CDT)	That's a start	Self	Will MacAskill	Self
2022-03-31 03:27:53 (CDT)	Thanks v much for the time Elon - pls let us know who in your office our GC can talk to - sleep well!	Martha Twitter	Egon Durban NomGov Parag	Martha Twitter Bret Taylor Self
2022-03-31 03:44:56 (CDT)	You're most welcome. Great to talk!	Self	Egon Durban NomGov Parag	Martha Twitter Bret Taylor Self
2022-03-31 06:38:41 (CDT)	By "tomorrow" do you mean Thursday or Friday?	Bret Taylor	Bret Taylor Self	Parag
2022-03-31 06:40:23 (CDT)	Today	Self	Bret Taylor Self	Parag
2022-03-31 07:00:35 (CDT)	I can make any time in those 10 hours work.	Parag	Bret Taylor Self	Parag
2022-03-31 07:05:28 (CDT)	I land in Oakland at 8:30pm. Perhaps we can meet at 9:30pm somewhere? I am working to see if I can move up my flight from NYC to land earlier in the meantime	Bret Taylor	Bret Taylor Self	Parag
2022-03-31 07:24:39 (CDT)	Working on landing earlier and landing in San Jose so we can have dinner near you. Will keep you both posted in real time	Bret Taylor	Bret Taylor Self	Parag
2022-03-31 08:17:43 (CDT)	Ok, successfully moved my flight to land at 6:30pm in San Jose. Working on a place we can meet privately	Bret Taylor	Bret Taylor Self	Parag

2022-03-31 12:29:28 (CDT)	Sounds good	Self	Bret Taylor	Parag
2022-03-31 15:23:49 (CDT)	Crypto spam on Twitter really needs to get crushed. It's a major blight on the user experience and they scam so many innocent people.	Self	Self	Parag
2022-03-31 16:46:35 (CDT)	Would you like me to intro you two via text?	Will MacAskill	Will MacAskill	Self
2022-03-31 17:25:52 (CDT)	It sounds like we are confirming 7pm at a private residence near San Jose. Our assistants reached out to Jehn on logistics. Let me know if either of you have any concerns or want to move things around. Looking forward to our conversation.	Bret Taylor	Bret Taylor	Parag
2022-03-31 17:50:42 (CDT)	Works for me. Excited to see you both in person!	Parag	Parag	Parag
2022-03-31 19:15:45 (CDT)	Would you like me to intro you two via text?	Will MacAskill	Will MacAskill	Self
2022-03-31 19:19:41 (CDT)	Jehn had a baby and I decided to try having no assistant for a few months	Self	Bret Taylor	Parag
2022-03-31 19:19:47 (CDT)	Likewise	Self	Bret Taylor	Parag
2022-03-31 19:22:06 (CDT)	The address is	Bret Taylor	Bret Taylor	Parag
2022-03-31 19:22:27 (CDT)	Does 7pm work for you Elon?	Bret Taylor	Bret Taylor	Parag
2022-03-31 19:28:19 (CDT)	Probably close to that time. Might only be able to get there by 7:30, but will try for earlier.	Self	Bret Taylor	Parag
2022-03-31 19:30:01 (CDT)	Sounds good. I am going to be a bit early because my plane is landing earlier but free all evening so we can start whenever you get there and Parag and I can catch up in the meantime	Bret Taylor	Bret Taylor	Parag
2022-03-31 21:01:08 (CDT)	This wins for the weirdest place I've had a meeting recently. I think they were looking for an airbnb near the airport and there are tractors and donkeys	Bret Taylor	Bret Taylor	Parag
2022-03-31 21:01:26 (CDT)	Haha awesome	Self	Bret Taylor	Parag
2022-03-31 21:02:17 (CDT)	Maybe Airbnb's algorithm thinks you love tractors and donkeys (who doesn't!)	Self	Bret Taylor	Parag
2022-03-31 21:02:42 (CDT)	On my way. There in about 15 mins.	Self	Bret Taylor	Parag
2022-03-31 21:05:33 (CDT)	And abandoned trucks in case we want to start a catering business after we meet	Bret Taylor	Bret Taylor	Parag
2022-03-31 21:09:56 (CDT)	Sounds like a post-apocalyptic movie set	Self	Bret Taylor	Parag
2022-03-31 21:10:18 (CDT)	Basically yes	Bret Taylor	Bret Taylor	Parag
2022-03-31 21:24:52 (CDT)	You vouch for him?	Self	Will MacAskill	Self
2022-03-31 21:25:58 (CDT)	Very much so! Very dedicated to making the long-term future of humanity go well	Will MacAskill	Will MacAskill	Self

2022-03-31 21:26:26 (CDT)	Ok then sure	Self ([REDACTED])	Will MacAskill [REDACTED], Self [REDACTED]
2022-03-31 21:27:15 (CDT)	Great! Will use Signal	Will MacAskill [REDACTED]	Will MacAskill [REDACTED]
2022-03-31 21:32:05 (CDT)	Hey, here's introducing you both, Sam and Elon. You both have interests in games, making the very long-run future go well, and buying Twitter. So I think you'd have a good conversation!	Will MacAskill [REDACTED]	Will MacAskill [REDACTED], Sam BF [REDACTED]
2022-03-31 21:32:40 (CDT)	(Signal doesn't work; used imessage instead)	Will MacAskill [REDACTED]	Will MacAskill [REDACTED], Self [REDACTED]
2022-04-01 00:33:23 (CDT)	Ok	Self [REDACTED]	Will MacAskill [REDACTED], Self [REDACTED]
2022-04-01 00:47:28 (CDT)	Great dinner :)	Self [REDACTED]	Bret Taylor [REDACTED], Parag [REDACTED]
2022-04-01 00:48:39 (CDT)	Really great. The donkeys and dystopian surveillance helicopters added to the ambiance	Bret Taylor [REDACTED]	Bret Taylor [REDACTED], Parag [REDACTED]
2022-04-01 01:08:52 (CDT)	Definitely one for the memory books haha	Self ([REDACTED])	Bret Taylor [REDACTED], Parag [REDACTED]
2022-04-01 01:55:20 (CDT)	Memorable for multiple reasons. Really enjoyed it	Parag [REDACTED]	Bret Taylor [REDACTED], Parag [REDACTED]
2022-04-01 11:44:09 (CDT)	And in case you want to get a feel for Sam, here's the Apr 1st tweet from his foundation, the Future Fund, which I'm advising on - I thought you might like it: https://twitter.com/futurefund/status/150992445242717440?s=20&t=0qjM58KUJ49xSga0gae97Q	Will MacAskill [REDACTED]	Will MacAskill [REDACTED], Self [REDACTED]
2022-04-01 11:44:11 (CDT)	And here's the actual (more informative) launch tweet - moving \$100M-\$1B this year to improve the future of humanity:	Will MacAskill [REDACTED]	Will MacAskill [REDACTED], Self [REDACTED]
2022-04-01 11:44:32 (CDT)	https://twitter.com/futurefund/status/1498350483206860801	Will MacAskill [REDACTED]	Will MacAskill [REDACTED], Self [REDACTED]
2022-04-01 17:35:46 (CDT)	Great to meet you Elon— happy to chat about Twitter (or other things) whenever!	Sam BF [REDACTED]	Will MacAskill [REDACTED], Sam BF [REDACTED]
2022-04-01 20:52:20 (CDT)	Hi!	Self [REDACTED]	Self [REDACTED]
2022-04-01 22:36:56 (CDT)	Maybe we can talk later today? I'm in Germany.	Self [REDACTED]	Will MacAskill [REDACTED], Sam BF [REDACTED]
2022-04-02 09:41:24 (CDT)	I'm on EST— could talk sometime between 7pm and 10pm Germany time today?	Sam BF [REDACTED]	Will MacAskill [REDACTED], Self [REDACTED]
2022-04-03 12:16:15 (CDT)	Connecting Martha (Twitter Nom/Gov) with Jared (runs my family office).	Self [REDACTED]	Jared Birchall ([REDACTED]), Martha Twitter [REDACTED]
2022-04-03 12:17:25 (CDT)	Jared, there is important paperwork to be done to allow for me to hopefully join the Twitter board.	Self [REDACTED]	Jared Birchall [REDACTED], Martha Twitter [REDACTED]
2022-04-03 12:18:30 (CDT)	Thanks Elon - appreciate this - hi Jared - I'm going to put Sean Edgett in touch with you who is GC at Twitter	Martha Twitter NomGov [REDACTED]	Jared Birchall [REDACTED], Martha Twitter [REDACTED]

2022-04-03 12:19:14 (CDT)	Sounds good. Please have him call anytime or send the docs to my email: Jared@excession.com	Jared Birchall ()	Jared Birchall () NomGov ()	Martha Twitter Self ()
2022-04-03 12:20:16 (CDT)	👍		Martha Twitter NomGov ()	Jared Birchall () NomGov () Martha Twitter Self ()
2022-04-03 12:47:42 (CDT)	Elon - are you available to chat for 5 mins?		Martha Twitter NomGov ()	Jared Birchall () NomGov () Martha Twitter Self ()
2022-04-03 12:48:02 (CDT)	I'd like to relay the board we just finished		Martha Twitter NomGov ()	Jared Birchall () NomGov () Martha Twitter Self ()
2022-04-03 12:49:44 (CDT)	Sure		Self ()	Jared Birchall () NomGov () Martha Twitter Self ()
2022-04-03 13:05:44 (CDT)	Just spoke to Martha. Let me know when you have time to talk today or tomorrow. Sounds like you are about to get on a flight — flexible		Bret Taylor ()	Bret Taylor () Self ()
2022-04-03 14:23:49 (CDT)	I expect you heard from Martha and Bret already. I'm super excited about the opportunity and look forward to working closely and finding ways to use your time as effectively as possible to improve Twitter and the public conversation.		Parag ()	Parag () Self ()
2022-04-03 14:35:28 (CDT)	Sounds great!		Self ()	Parag () Self ()
2022-04-03 14:51:06 (CDT)	Sounds good. I'm just about to take off from Berlin to Austin, but free to talk anytime tomorrow.		Self ()	Bret Taylor () Self ()
2022-04-03 14:51:51 (CDT)	I am free all day. Text when you are available. Planning to take a hike with my wife and that is the only part where my reception may be spotty. Looking forward to speaking. And looking forward to working with you!		Bret Taylor ()	Bret Taylor () Self ()
2022-04-03 14:55:02 (CDT)	Liked "I am free all day. Text when you are available. Planning to take a hike with my wife and that is the only part where my reception may be spotty. Looking forward to speaking. And looking forward to working with you!"		Self ()	Bret Taylor () Self ()
2022-04-03 18:20:49 (CDT)	I heard good things are happening		jack jack ()	jack jack () Self ()
2022-04-03 22:22:00 (CDT)	Liked "I heard good things are happening"		Self ()	jack jack () Self ()
2022-04-04 06:27:06 (CDT)	Congrats to the Twitter invest! Fast execution 🤗 Shall we discuss whether we should join that project? I was serious with my suggestion.		Mathias Döpfner ()	Mathias Döpfner () Self ()
2022-04-04 07:37:45 (CDT)	Love it !!		Ken Griffin ()	Ken Griffin () Self ()
2022-04-04 07:55:33 (CDT)	Excited to see the stake in Twitter - awesome. "Back door man" they are saying haha. Hope you're able to influence it. I bet you the board doesn't even get full reporting or see any report of the censorship decisions and little cabals going on there but they should - the lefties on the board likely want plausible deniability!		Joe Lonsdale ()	Joe Lonsdale () Self ()
2022-04-04 08:49:32 (CDT)	Hey are you available?		Bret Taylor ()	Bret Taylor () Self ()

2022-04-04 08:52:30 (CDT)					Self ([REDACTED])
2022-04-04 09:07:32 (CDT)					Self ([REDACTED])
2022-04-04 09:08:17 (CDT)					Self ([REDACTED])
2022-04-04 09:10:04 (CDT)				Bret Taylor	Self ([REDACTED])
2022-04-04 09:46:48 (CDT)				Egon Durban	Self ([REDACTED])
2022-04-04 10:58:50 (CDT)				Self	Self ([REDACTED])
2022-04-04 10:59:11 (CDT)				Egon Durban	Self ([REDACTED])
2022-04-04 11:01:25 (CDT)				Self	Self ([REDACTED])
2022-04-04 11:01:54 (CDT)				Jared Birchall ([REDACTED])	Self ([REDACTED])
2022-04-04 11:15:23 (CDT)				Joe Lonsdale	Self ([REDACTED])
2022-04-04 11:15:29 (CDT)				Ken Griffin	Self ([REDACTED])
2022-04-04 11:15:52 (CDT)				Mathias Döpfner	Self ([REDACTED])
2022-04-04 11:19:26 (CDT)				Mathias Döpfner	Self ([REDACTED])
2022-04-04 11:40:55 (CDT)				Jared Birchall	Martha Twitter
2022-04-04 11:53:01 (CDT)				NomGov ([REDACTED])	Self ([REDACTED])
2022-04-04 11:53:37 (CDT)				Jared Birchall	Martha Twitter
2022-04-04 11:54:05 (CDT)				NomGov ([REDACTED])	Self ([REDACTED])
				Mathias Döpfner	Self ([REDACTED])

Congratulations!! The above article [REDACTED] was laying out some of the things that might happen: Step 1: Blame the platform for its users Step 2. Coordinated pressure campaign Step 3: Exodus of the Bluechecks Step 4: Deplatforming "But it will not be easy. It will be a war. Let the battle begin."

It will be a delicate game of letting right wingers back on Twitter and how to navigate that (especially the boss himself, if you're up for that) I would also lay out the standards early but have someone who has a savvy cultural/political view to be the VP of actual enforcement

A Blake Masters type

Given the SEC filing, would like to speak asap to coordinate on communications. Call asap when you are back

Hi - if you have a few moments call anytime ? Flying to UK

Just spoke to Bret. His call woke me up haha. Got it from Berlin at 4am.

Please talk to Martha about the filing

ok

Liked "Excited to see the stake in Twitter - awesome. "Back door man" they are saying haha. Hope you're able to influence it. I bet you the board doesn't even get full reporting or see any report of the censorship decisions and little cabals going on there but they should - the lefties on the board likely want plausible deniability !"

Liked "Love it !!"

Sure, happy to talk I am going to miami tomorrow for a week. Shall we speak then on Wednesday and take it from there ?

Morning elon - you woke up to quite a storm.... Great to hear from Bret that you agree we can move this along v quickly today - Jared, I'm assuming it's you I should send the standstill they discussed to you? It will be the same as egon and silverlake undertook. Let me know if should go to someone else - we're really keen to get this done in next couple of hours. Thank you

You can send to both of us

Sorry, I just woke up when Bret called! I arrived from Berlin around 4am.

Sure

2022-04-04 11:57:57 (CDT)	No apologies necessary. Let's How would you like it sent? If by email, pls let me know where	Martha Twitter NomGov	Jared Birchall (), Martha Twitter NomGov () Self
2022-04-04 12:00:06 (CDT)	Text or email	Self	Jared Birchall () NomGov () Self Martha Twitter
2022-04-04 12:00:26 (CDT)	My email is	Self	Jared Birchall () NomGov () Self Martha Twitter
2022-04-04 12:00:34 (CDT)	Liked "Hi E ,Pain settling down? Time for a latter-day Guttenburg to bring back free speech and buy Twitter."	Martha Twitter NomGov ()	Jared Birchall () NomGov () Self Martha Twitter
2022-04-04 12:04:51 (CDT)	<Attachment - application/vnd.openxmlformats-officedocument.wordprocessingml.document - Twitter Cooperation Agreement - Draft April 4 2022.docx>	Self	Dr Jabour () Self
2022-04-04 12:42:39 (CDT)	Here it is - also gone by email Same as Egon's but even more pared back Just copying you both to confirm sent agreement - v keen to get this done quickly as per your conversation	Martha Twitter NomGov	Jared Birchall () NomGov () Self Martha Twitter
2022-04-04 12:46:38 (CDT)	Do you have five minutes?	Bret Taylor	Martha Twitter NomGov () Taylor () Self Bret
2022-04-04 14:13:24 (CDT)	Sure	Self	Bret Taylor () Self
2022-04-04 14:14:33 (CDT)	Happy to talk if you'd like	Self	Parag () Self
2022-04-04 14:29:44 (CDT)	That will be very helpful. Please call me when you have a moment	Parag	Parag () Self
2022-04-04 15:03:45 (CDT)	Just on the phone with Jared. Will call as soon as that's done.	Self	Parag () Self
2022-04-04 15:06:29 (CDT)	Liked "Just on the phone with Jared. Will call as soon as that's done."	Parag	Parag () Self
2022-04-04 15:11:45 (CDT)	So can you bust us out of Twitter jail now lol	Kyle	Kyle () Self
2022-04-04 15:39:44 (CDT)	I do not have that ability	Self	Kyle () Self
2022-04-04 15:47:16 (CDT)	Thank you for considering me for the Twitter board, but, after thinking it over, my current time commitments would prevent me from being an effective board member. This may change in the future. Elon	Self	Jared Birchall () Egon Durban Martha Twitter NomGov Bret Taylor () Self
2022-04-04 15:51:41 (CDT)	Are you going to liberate Twitter from the censorship happy mob?	Self	Joe Rogan () Self
2022-04-04 16:36:50 (CDT)	I will provide advice, which they may or may not choose to follow	Joe Rogan	Joe Rogan () Self
2022-04-04 16:43:23 (CDT)	Lol I know I know. Big move though, love to see it	Self	Kyle () Self
2022-04-04 18:36:07 (CDT)	https://twitter.com/trungtohan/status/1510994320471429131?s=10&t=arv_f0hTfuzRVDe1bJKIQ	Kyle	Kyle () Self
2022-04-04 20:19:40 (CDT)	You should have an updated agreement in your email. I'm available to chat.	Bret Taylor	Bret Taylor () Self
2022-04-04 21:17:30 (CDT)		Parag	Parag () Self

2022-04-04 21:25:15 (CDT)	Laughed at "https://twitter.com/trungthphan/status/1510994320471429131?s=10&t=qrv_foHTfUzRVDe_b/KIQ"	Self	[REDACTED]	Bret Taylor	Self
2022-04-04 21:25:24 (CDT)	Approved	Self	[REDACTED]	Parag	Self
2022-04-04 22:41:59 (CDT)	Loved "Approved"	Parag	[REDACTED]	Parag	Self
2022-04-04 22:42:19 (CDT)	Have a few mins to chat? I'm eager to move fast	Parag	[REDACTED]	Parag	Self
2022-04-04 22:51:52 (CDT)	Sure, I'm just on a SpaceX engine review call.	Self	[REDACTED]	Parag	Self
2022-04-04 22:52:22 (CDT)	Please call me after	Parag	[REDACTED]	Parag	Self
2022-04-05 01:18:20 (CDT)	I'm excited to share that we're appointing @elonmusk to our board! Through conversations with Elon in recent weeks, it became clear to me that he would bring great value to our Board. Why? Above all else, he's both a passionate believer and intense critic of the service which is exactly what we need on Twitter, and in the Boardroom, to make us stronger in the long-term. Welcome Elon!	Parag	[REDACTED]	Parag	Self
2022-04-05 02:05:46 (CDT)	Sounds good	Self	[REDACTED]	Parag	Self
2022-04-05 07:31:19 (CDT)	Sending out shortly?	Self	[REDACTED]	Parag	Self
2022-04-05 07:33:16 (CDT)	https://twitter.com/paraga/status/1511320953598357505?s=21&t=g9XkMyPGFahuVNDKcob	Parag	[REDACTED]	Parag	Self
2022-04-05 07:40:09 (CDT)	a5A	Self	[REDACTED]	Parag	Self
2022-04-05 07:41:36 (CDT)	Cool	Parag	[REDACTED]	Parag	Self
2022-04-05 07:41:36 (CDT)	Super excited!	Parag	[REDACTED]	Parag	Self
2022-04-05 07:52:06 (CDT)	I'm so thrilled you're joining the board. I apologise about the bump of the first agreement- I'm not a good manager of lawyers. I really look forward to meeting you.	Martha Twitter	NomGov	Jared Birchall	Martha Twitter
2022-04-05 07:56:40 (CDT)	I am excited to work with you and grateful this worked out	Bret Taylor	[REDACTED]	Bret Taylor	Self
2022-04-05 08:07:14 (CDT)	Thank you for joining!	jack jack	[REDACTED]	jack jack	Self
2022-04-05 08:07:17 (CDT)	https://twitter.com/jack/status/1511329369473564677?s=21&t=DdrUUFuJPD7Kf-iXiBoqig	jack jack	[REDACTED]	jack jack	Self
2022-04-05 13:53:33 (CDT)	Absolutely. Hope I can be helpful	Self	[REDACTED]	jack jack	Self
2022-04-05 13:54:35 (CDT)	Likewise	Self	[REDACTED]	Bret Taylor	Self
2022-04-05 13:55:02 (CDT)	Thanks Martha, same here.	Self	[REDACTED]	Jared Birchall	[REDACTED], Martha Twitter
2022-04-05 13:55:08 (CDT)	Likewise!	Self	[REDACTED]	NomGov	Self
2022-04-05 15:00:50 (CDT)	Immensely. Parag is an incredible engineer. The board is terrible. Always here to talk through anything you want.	jack jack	[REDACTED]	Parag	Self
2022-04-05 15:27:57 (CDT)	When is a good time to talk confidentially?	Self	[REDACTED]	jack jack	Self
2022-04-05 15:28:11 (CDT)	anytime	jack jack	[REDACTED]	jack jack	Self
2022-04-05 17:08:24 (CDT)	Thanks, great conversation!	Self	[REDACTED]	jack jack	Self
2022-04-05 17:10:53 (CDT)	Always! I couldn't be happier you're doing this. I've wanted it for a long time. Got very emotional when I learned it was finally possible.	jack jack	[REDACTED]	jack jack	Self
2022-04-05 17:28:40 (CDT)	Loved "Always! I couldn't be happier you're doing this. I've wanted it for a long time. Got very emotional when I learned it was finally possible."	Self	[REDACTED]	jack jack	Self
2022-04-05 17:29:16 (CDT)	Please be super vocal if there is something dumb I'm doing or not doing. That would be greatly appreciated.	Self	[REDACTED]	jack jack	Self

2022-04-05 17:30:47 (CDT)	Just had a great conversation with Jack! Are you free to talk later tonight?	Self	Parag	Self
2022-04-05 17:32:11 (CDT)	I trust you but def will do	jack jack	jack jack	Self
2022-04-05 17:34:03 (CDT)	Yeah, what time?	Parag	Parag	Self
2022-04-05 17:34:22 (CDT)	Would be great to unwind permanent bans, except for spam accounts and those that explicitly advocate violence.	Self	Parag	Self
2022-04-05 17:35:09 (CDT)	7pm CA time? Or anytime after that.	Self	Parag	Self
2022-04-05 17:35:18 (CDT)	Liked "I trust you but def will do"	Self	jack jack	Self
2022-04-05 17:37:00 (CDT)	7p works! Talk soon	Parag	Parag	Self
2022-04-05 21:01:27 (CDT)	Calling back in a few mins	Self	Parag	Self
2022-04-05 21:01:34 (CDT)	Liked "Calling back in a few mins"	Parag	Parag	Self
2022-04-05 22:20:01 (CDT)	Pretty good summary	Self	Parag	Self
2022-04-05 22:20:03 (CDT)	https://twitter.com/stevenmarkvan/status/1511489781104275456?s=10&t=LorGG-7kefKLnXl93jpiQ	Self	Parag	Self
2022-04-06 00:19:20 (CDT)	If you plan on joining the Nom/Gov or Comp Committees, lmk and I can give you some tips! Haha! 🤔	Ira Ehrenpreis	Ira Ehrenpreis	Self
2022-04-06 00:26:24 (CDT)	Haha, I didn't even want to join the Twitter board! They pushed really hard to have me join.	Self	Ira Ehrenpreis	Self
2022-04-06 00:27:08 (CDT)	You're a pushover! 😊	Ira Ehrenpreis	Ira Ehrenpreis	Self
2022-04-06 00:29:09 (CDT)	And you already got them to try the edit! Oh yeah... it had already been in the works. Sure.	Ira Ehrenpreis	Ira Ehrenpreis	Self
2022-04-06 01:23:02 (CDT)	It was actually in the works, but I didn't know. I fucking love that you are majority owner of Twitter. My friends David and Daniel have a program that verifies identity that would be nice to connect to Twitter. As in, if people chose to use it, it could verify that they are a real person and not a troll farm. I should introduce you to them.	Self	Ira Ehrenpreis	Self
2022-04-06 01:35:13 (CDT)	Gayle here! Have you missed me (smile) Are you ready for to do a proper sit down with me so much to discuss! especially with your twitter play ... what do I need to do ??? Ps I like a twitter edit feature with a 24 hour time limit ... we all say shit we regret want to take back in the heat of the moment ...	Justin Roiland	Justin Roiland	Self
2022-04-06 05:21:09 (CDT)	Twitter edit button is coming	Gayle King	Gayle King	Self
2022-04-06 07:03:39 (CDT)	The whole Twitter thing getting blown out of proportion	Self	Gayle King	Self
2022-04-06 07:07:53 (CDT)	Owning ~9% is not quite control	Self	Gayle King	Self
2022-04-06 07:08:17 (CDT)	I never thought that it did ... and I'm not good in math	Gayle King	Gayle King	Self
2022-04-06 07:08:48 (CDT)	Twitter should move more to the center, but Parag already thought that should be the case before I came along.	Self	Gayle King	Self
2022-04-06 07:09:01 (CDT)	Laughed at "I never thought that it did ... and I'm not good in math"	Self	Gayle King	Self

2022-04-06 09:23:43 (CDT)	<p>A short call about Twitter? # Status Quo: it is the de facto public town square, but it is a problem that it does not adhere to free speech principles. => so the core product is pretty good, but (i) it does not serve democracy, and (ii) the current business model is a dead end as reflected by flat share price. # Goal: Make Twitter the global backbone of free speech, an open market place of ideas that truly complies with the spirit of the first amendment and shift the business model to a combination of ad-supported and paid to support quality # Game Plan: 1.) „Solve Free Speech“ 1a) Step 1: Make it censorship-FREE by radically reducing Terms of Services (now hundreds of pages) to the following: Twitter users agree to: (1) Use our service to send spam or scam users, (2) Promote violence, (3) Post illegal pornography. ☺ 1b) Step 2: Make Twitter censorship-RESISTANT • Ensure censorship resistance by implementing measures that warrant that Twitter can't be censored long term, regardless of which government and management. • How? Keep pushing projects at Twitter that have been working on developing a decentralized social network protocol (e.g., BlueSky). It's not easy, but the backend must run on decentralized infrastructure, APIs should become open (back to the roots! Twitter started and became big with open APIs). • Twitter would be one of many clients to post and consume content. • Then create a marketplace for algorithms, e.g., if you're a snowflake and don't want content that offends you pick another algorithm. 2.) „Solve Share Price“ Current state of the business: • Twitter's ad revenues grow steadily and for the time being, are sufficient to fund operations. • MAUs are flat, no structural growth • Share price is flat, no confidence in the existing business model and/or</p>	Mathias Döpfner ([REDACTED])	Mathias Döpfner ([REDACTED]), Self ([REDACTED])
2022-04-06 09:40:03 (CDT)	https://twitter.com/Matthavaral/status/151173605239078914	Mathias Döpfner ([REDACTED])	Mathias Döpfner ([REDACTED]), Self ([REDACTED])
2022-04-06 13:45:31 (CDT)	Looks like there's a "verified" account in the swamp of despair over there.	jack jack ([REDACTED])	Self ([REDACTED])
2022-04-06 13:57:06 (CDT)	https://m.facebook.com/Elonmuskoff?ref=nf&pn_ref=story&rc=p	jack jack ([REDACTED])	Self ([REDACTED])
2022-04-06 13:57:06 (CDT)	Haha	Self ([REDACTED])	Self ([REDACTED])
2022-04-07 10:29:41 (CDT)	A host of ideas around this merit exploration - even lower friction ones than this.	Parag ([REDACTED])	Self ([REDACTED])
2022-04-07 10:33:41 (CDT)	I have a thought about this that could take out two birds with one stone	Parag ([REDACTED])	Self ([REDACTED])
2022-04-07 10:33:47 (CDT)	Btw, what's your email?	Parag ([REDACTED])	Self ([REDACTED])
2022-04-07 10:38:19 (CDT)	paraga@twitter.com	Parag ([REDACTED])	Self ([REDACTED])
2022-04-07 10:51:53 (CDT)	Would you be able to do a q&a for employees next week virtually? My travel is causing too long of a delay and only about 10-15% of audience will be in person so we will be optimizing for virtual anyways. Would any of Wed/Thu 11a pacific next week work for you for a 45 min video q&a? — else I can suggest other times. Trying to maximize attendance across global timezones.	Parag ([REDACTED])	Self ([REDACTED])
2022-04-07 10:53:34 (CDT)	Would love to hear more when we speak next - do you have any availability tomorrow?	Parag ([REDACTED])	Self ([REDACTED])
2022-04-07 11:39:25 (CDT)	Sure	Self ([REDACTED])	Self ([REDACTED])
2022-04-07 11:40:00 (CDT)	It would be great to get an update from the Twitter engineering team so that my suggestions are less dumb.	Self ([REDACTED])	Self ([REDACTED])

	<p>Yep - will set up a product + eng conversation ahead of q&a - they said, I expect most questions to not get into specific ideas / depth - but more around what you believe about the future of Twitter and why it matters, why you can personally, how to want to engage with us, what you hope to see change ... — but also some from people who are upset that you are involved and generally don't like you for some reason. As you said yesterday, goal is for people to just hear you speak directly instead of make assumptions about you from media stories. Would Thursday 11a pacific work next week for the q&a?</p>	<p>Parag Self Self Parag</p>	<p>Parag Parag Parag Parag</p>	<p>Self Self Self Self</p>
<p>2022-04-07 12:20:09 (CDT)</p>	<p>11am PT on Wed works great</p>	<p>Parag</p>	<p>Parag</p>	<p>Self</p>
<p>2022-04-07 18:38:44 (CDT)</p>	<p>Exactly. Thurs 11 PT works.</p>	<p>Self</p>	<p>Parag</p>	<p>Self</p>
<p>2022-04-07 18:40:38 (CDT)</p>	<p>Ok cool. So will confirm a convo Wed 11a PT with small eng and product leads. And the AMA on Thu 11a PT.</p>	<p>Parag</p>	<p>Parag</p>	<p>Self</p>
<p>2022-04-07 19:28:02 (CDT)</p>	<p>Also: my email to company about AMA leaked already + lots of leaks from internal slack messages: https://www.washingtonpost.com/technology/2022/04/07/musk-twitter-employee-outcry/ - I think there is a large silent majority that is excited about you bring on the board, so this isn't representative. Happy to talk about it - none of this is a surprise.</p>	<p>Parag</p>	<p>Parag</p>	<p>Self</p>
<p>2022-04-07 19:29:09 (CDT)</p>	<p>Seedy</p>	<p>Self</p>	<p>Parag</p>	<p>Self</p>
<p>2022-04-07 19:29:23 (CDT)</p>	<p>*awesome (damn autocorrect!)</p>	<p>Self</p>	<p>Parag</p>	<p>Self</p>
<p>2022-04-07 19:30:38 (CDT)</p>	<p>As expected. Yeah, would be good to sync up. I can talk tomorrow night or anytime this weekend. I love our conversations!</p>	<p>Self</p>	<p>Parag</p>	<p>Self</p>
<p>2022-04-07 19:32:49 (CDT)</p>	<p>I'm totally flexible after 530p pacific tomorrow - let me know what works. And yes this is expected - and I think a good thing to move us in a positive direction. Despite the turmoil internally - I think this is very helpful in moving the company forward.</p>	<p>Parag</p>	<p>Parag</p>	<p>Self</p>
<p>2022-04-07 19:33:14 (CDT)</p>	<p>Awesome!</p>	<p>Self</p>	<p>Parag</p>	<p>Self</p>
<p>2022-04-07 19:34:15 (CDT)</p>	<p>I have a ton of ideas, but lmk if I'm pushing too hard. I just want Twitter to be maximum amazing.</p>	<p>Self</p>	<p>Parag</p>	<p>Self</p>
<p>2022-04-07 19:35:06 (CDT)</p>	<p>I want to hear all the ideas - and I'll tell you which ones I'll make progress on vs. not. And why.</p>	<p>Parag</p>	<p>Parag</p>	<p>Self</p>
<p>2022-04-07 19:35:49 (CDT)</p>	<p>And in this phase — just good to spend as much time with you. + have my Product and Eng team talk to you to ingest information on both sides.</p>	<p>Parag</p>	<p>Parag</p>	<p>Self</p>
<p>2022-04-07 19:36:37 (CDT)</p>	<p>I would like to understand the technical details of the Twitter codebase. This will help me calibrate the dumbness of my suggestions.</p>	<p>Parag</p>	<p>Parag</p>	<p>Self</p>
<p>2022-04-07 19:36:50 (CDT)</p>	<p>I wrote heavy duty software for 20 years</p>	<p>Self</p>	<p>Parag</p>	<p>Self</p>
<p>2022-04-07 19:37:42 (CDT)</p>	<p>I used to be CTO and have been in our codebase for a long time.</p>	<p>Parag</p>	<p>Parag</p>	<p>Self</p>
<p>2022-04-07 19:37:57 (CDT)</p>	<p>So I can answer many many of your questions.</p>	<p>Parag</p>	<p>Parag</p>	<p>Self</p>
<p>2022-04-07 19:38:15 (CDT)</p>	<p>I interface way better with engineers who are able to do hardcore programming than with program manager / MBA types of people.</p>	<p>Self</p>	<p>Parag</p>	<p>Self</p>
<p>2022-04-07 19:38:25 (CDT)</p>	<p>Liked "I used to be CTO and have been in our codebase for a long time."</p>	<p>Self</p>	<p>Parag</p>	<p>Self</p>
<p>2022-04-07 19:38:35 (CDT)</p>	<p>👍</p>	<p>Self</p>	<p>Parag</p>	<p>Self</p>
<p>2022-04-07 19:39:09 (CDT)</p>	<p>in our next convo - treat me like an engineer instead of CEO and lets see where we get to. I'll know after that convo who might be the best engineer to connect you to.</p>	<p>Parag</p>	<p>Parag</p>	<p>Self</p>
<p>2022-04-07 19:40:18 (CDT)</p>	<p>Frankly, I hate doing mgmt stuff. I kinda don't think anyone should be the boss of anyone. But I love helping solve technical/product design problems.</p>	<p>Self</p>	<p>Parag</p>	<p>Self</p>
<p>2022-04-07 19:40:32 (CDT)</p>	<p>You got it!</p>	<p>Self</p>	<p>Parag</p>	<p>Self</p>

2022-04-07 19:41:05 (CDT)	Look forward to speaking tomorrow. Do you like calendar invites sent to your email address?	Parag	Self (
2022-04-07 19:41:28 (CDT)	Liked "Look forward to speaking tomorrow. Do you like calendar invites sent to your email address?"	Self (Self (
2022-04-07 19:42:25 (CDT)	I already put the two dates on my calendar, but no problem to send me supplementary stuff.	Self (Justin Rolland
2022-04-08 05:51:59 (CDT)	I just own 9% of Twitter, so don't control the company.	Self (Justin Rolland (
2022-04-08 05:52:45 (CDT)	Will raise the identity issue with Parag (CEO).	Self (Self (
2022-04-08 19:37:37 (CDT)	I'm available starting now if you want to have a chat about engineering at Twitter. Let me know!	Parag	Parag
2022-04-08 19:40:28 (CDT)	Call in about 45 mins?	Self (Self (
2022-04-08 19:40:38 (CDT)	Liked "Call in about 45 mins?"	Parag	Parag
2022-04-08 20:44:17 (CDT)	Will call back shortly	Self (Self (
2022-04-08 22:10:56 (CDT)	<Attachment - image/png - Screenshot 2022-04-08 at 10.10.09 PM.png>	Self (Self (
2022-04-08 22:10:56 (CDT)	I am so sick of stuff like this	Self (Self (
2022-04-08 22:56:00 (CDT)	We should be catching this	Parag	Parag
2022-04-08 23:14:56 (CDT)	Yeah	Self (Self (
2022-04-09 03:20:00 (CDT)	I have an idea for a blockchain social media system that does both payments and short text messages/links like twitter. You have to pay a tiny amount to register your message on the chain, which will cut out the vast majority of spam and bots. There is no throat to choke, so free speech is guaranteed.	Self (Kimbal Musk
2022-04-09 03:23:30 (CDT)	The second piece of the puzzle is a massive real-time database that keeps a copy of all blockchain messages in memory, as well as all message sent to or received by you, your followers and those you follow.	Self (Kimbal Musk
2022-04-09 03:23:15 (CDT)	Third piece is a twitter-like app on your phone that accessed the database in the cloud.	Self (Kimbal Musk
2022-04-09 03:23:20 (CDT)	This could be massive	Self (Kimbal Musk
2022-04-09 10:01:35 (CDT)	You are free to tweet "is Twitter dying?" or anything else about Twitter - but it's my responsibility to tell you that it's not helping me make Twitter better in the current context.	Parag	Self (
2022-04-09 10:02:24 (CDT)	Next time we speak, I'd like to you provide your perspective on the level of internal distraction right now and how it hurting our ability to do work. I hope the AMA will help people get to know you, to understand why you believe in Twitter, and to trust you - and I'd like the company to get to a place where we are more resilient and don't get distracted, but we aren't there right now.	Self (Self (
2022-04-09 10:03:04 (CDT)	What did you get done this week?	Self (Self (
2022-04-09 10:03:04 (CDT)	I'm not joining the board. This is a waste of time.	Self (Self (
2022-04-09 10:03:19 (CDT)	Will make an offer to take Twitter private.	Self (Self (
2022-04-09 10:03:26 (CDT)	I'd love to learn more. I've dug deep on Web3 (not crypto as much) and the voting powers are amazing and verified. Lots you could do here for this as well	Kimbal Musk (Kimbal Musk
2022-04-09 10:05:38 (CDT)	I think a new social media company is needed that is based on a blockchain and includes payments	Self (Kimbal Musk

2022-04-09 10:05:51 (CDT)	Would have them pay w a token associated w the service? You'd have to hold the token in your wallet to post. Doesn't have to expensive it will grow over time in value	Kimbal Musk	Kimbal Musk	Self
2022-04-09 10:07:06 (CDT)	Can we talk?	Parag	Parag	Self
2022-04-09 10:07:59 (CDT)	Blockchain prevents people from deleting tweets. Pros and cons, but let the games begin!	Kimbal Musk	Kimbal Musk	Self
2022-04-09 10:10:33 (CDT)	Parag just called me and mentioned your text conversation. Can you talk?	Bret Taylor	Bret Taylor	Self
2022-04-09 10:12:22 (CDT)	If you did use your own token, you would not need advertising it's a pay for use service but at a very low price	Kimbal Musk	Kimbal Musk	Self
2022-04-09 10:13:18 (CDT)	With scale it will be a huge business purely for the benefit of the users. I hate advertisements	Kimbal Musk	Kimbal Musk	Self
2022-04-09 10:13:45 (CDT)	Liked "With scale it will be a huge business purely for the benefit of the users. I hate advertisements"	Self	Self	Self
2022-04-09 10:17:11 (CDT)	There are some good ads out there. The voting component of interested users (only vote if you want to) could vote on ads that add value. The advertisers would have to stake a much larger amount of tokens, but other than there is no charge for the ads. It will bring out the creatives and the ads can politically incorrect/art/activision/philanthropy	Kimbal Musk	Kimbal Musk	Self
2022-04-09 10:25:29 (CDT)	Please expect a take private offer	Self	Bret Taylor	Self
2022-04-09 10:26:05 (CDT)	I saw the text thread. Do you have five minutes so I can understand the context? I don't currently	Bret Taylor	Bret Taylor	Self
2022-04-09 10:26:44 (CDT)	Fixing twitter by chatting with Parag won't work	Self	Bret Taylor	Self
2022-04-09 10:26:59 (CDT)	Drastic action is needed	Self	Bret Taylor	Self
2022-04-09 10:28:07 (CDT)	This is hard to do as a public company, as purging fake users will make the numbers look terrible, so restructuring should be done as a private company.	Self	Bret Taylor	Self
2022-04-09 10:28:14 (CDT)	This is Jack's opinion too.	Self	Bret Taylor	Self
2022-04-09 10:30:43 (CDT)	Can you take 10 minutes to talk this through with me? It has been about 24 hours since you joined the board. I get your point, but just want to understand about the sudden pivot and make sure I deeply understand your point of view and the path forward	Bret Taylor	Bret Taylor	Self
2022-04-09 10:55:09 (CDT)	Voting rights could also crowdsource kicking scammers out. It drives me crazy when I see people promoting the scam that you're giving away Bitcoin. Lots of bad people out there	Kimbal Musk	Kimbal Musk	Self
2022-04-09 12:11:27 (CDT)	I'm about to take off, but can talk tomorrow	Self	Bret Taylor	Self
2022-04-09 12:18:21 (CDT)	Thank you	Bret Taylor	Bret Taylor	Self
2022-04-09 22:20:24 (CDT)	Hey — can you speak this evening? I have seen your tweets and feel more urgency about understanding your path forward	Bret Taylor	Bret Taylor	Self
2022-04-10 14:01:07 (CDT)	Acknowledging your text with Parag yesterday that you are declining to join the board. This will be reflected in our 8-K tomorrow. I've asked our team to share a draft with your family office today. I'm looking forward to speaking today.	Bret Taylor	Bret Taylor	Self


2022-04-10 15:44:22 (CDT)	Sounds good	Self ([REDACTED])	Bret Taylor	Self ([REDACTED])
2022-04-10 15:45:35 (CDT)	It is better, in my opinion, to take Twitter private, restructure and return to the public markets once that is done. That was also Jack's view when I talked to him.	Self ([REDACTED])	Bret Taylor	Self ([REDACTED])
2022-04-12 23:17:11 (CDT)	Have any time to see Philippe Laffont in Vancouver tomorrow?	Michael Kives ([REDACTED])	Michael Kives ([REDACTED])	Self ([REDACTED])
2022-04-12 23:41:57 (CDT)	Maybe	Self ([REDACTED])	Michael Kives ([REDACTED])	Self ([REDACTED])
2022-04-12 23:49:50 (CDT)	Any particular time of best?	Michael Kives ([REDACTED])	Michael Kives ([REDACTED])	Self ([REDACTED])
2022-04-12 23:53:47 (CDT)	*any time best?	Michael Kives ([REDACTED])	Michael Kives ([REDACTED])	Self ([REDACTED])
2022-04-13 00:12:09 (CDT)	What exactly does he want?	Self ([REDACTED])	Michael Kives ([REDACTED])	Self ([REDACTED])
2022-04-13 00:16:54 (CDT)	Has some ideas on Twitter Owns a billion of Tesla Did last 2 or 3 SpaceX rounds And-wants to get into Boring in the future (I told him to help with recruiting) You could honestly do like 20 mins in your hotel He's super smart, good guy	Michael Kives ([REDACTED])	Michael Kives ([REDACTED])	Self ([REDACTED])
2022-04-13 00:36:57 (CDT)	Ok, he can come by tonight. Room 1001 at Shangri-La.	Self ([REDACTED])	Michael Kives ([REDACTED])	Self ([REDACTED])
2022-04-13 01:01:37 (CDT)	Need to find you a great assistant! I'm headed to bed I'll tell Philippe to email you when he lands tonight in case you're still up and want to meet	Michael Kives ([REDACTED])	Michael Kives ([REDACTED])	Self ([REDACTED])
2022-04-13 19:47:57 (CDT)	After several days of deliberation - this is obviously a matter of serious gravity - I have decided to move forward with taking Twitter private. I will send you an offer letter tonight, which will be public in the morning. Happy to connect you with my team if you have any questions. Thanks, Elon	Self ([REDACTED])	Bret Taylor	Self ([REDACTED])
2022-04-13 21:05:26 (CDT)	Acknowledged	Bret Taylor	Bret Taylor	Self ([REDACTED])
2022-04-13 21:18:50 (CDT)	Confirming I received your email. Also, please use btaylor@gmail.com going forward, my personal email.	Bret Taylor	Bret Taylor	Self ([REDACTED])
2022-04-13 21:41:38 (CDT)	Will do	Self ([REDACTED])	Bret Taylor	Self ([REDACTED])
2022-04-14 06:44:46 (CDT)	My Plan B is a blockchain-based version of twitter, where the "tweets" are embedded in the transaction as comments. So you'd have to pay maybe 0.1 Doge per comment or repost of that comment.	Self ([REDACTED])	Steve Davis	Self ([REDACTED])
2022-04-14 06:44:52 (CDT)	https://twitter.com/elonmusk/status/1514564966564651008?s=10&t=0fQ6fmj_4DuQrOdkKlTOqQ	Self ([REDACTED])	Steve Davis	Self ([REDACTED])
2022-04-14 06:50:07 (CDT)	ELON! You buying twitter or offering to buy twitter Wow! Now Don't you think we should sit down together face to face this is as the kids of today say a "gangsta move" I don't know know how shareholders turn this down ..like I said you are not like the other kids in the class ...	Gayle King ([REDACTED])	Gayle King ([REDACTED])	Self ([REDACTED])
2022-04-14 08:06:39 (CDT)	Amazing! Not sure which plan to root for. If Plan B wins, let me know if blockchain engineers would be helpful.	Steve Davis ([REDACTED])	Steve Davis ([REDACTED])	Self ([REDACTED])
2022-04-14 08:30:27 (CDT)	Btw Elon - would love to talk about Twitter Also a post on how blockchain+Twitter could work:	Sam BF ([REDACTED])	Will MacAskill ([REDACTED])	Sam BF ([REDACTED])

2022-04-14 08:30:29 (CDT)	https://twitter.com/sbf_fbx/status/1514588820641128452?s=21&t=1CjLhLFjYjMognjOucitw	Sam BF ([REDACTED]) Will MacAskill ([REDACTED]), Self ([REDACTED]), Sam BF ([REDACTED])
2022-04-14 08:52:07 (CDT)	https://twitter.com/sbf_fbx/status/1514588820641128452?s=21&t=0a-Z4pA_Ct35ud6M60q3ng	Michael Kives ([REDACTED]) Michael Kives ([REDACTED]) Michael Kives ([REDACTED])
2022-04-14 08:52:42 (CDT)	Could be cool to do this with Sam Bankman-Fried	Marc Merrill (Riot) ([REDACTED]) Marc Merrill (Riot) ([REDACTED]) Self ([REDACTED])
2022-04-14 08:58:46 (CDT)	https://ground.news/article/elon-musk-offers-to-buy-twitter-for-4139-billion_20a2b3	Marc Merrill (Riot) ([REDACTED]) Marc Merrill (Riot) ([REDACTED])
2022-04-14 08:58:46 (CDT)	you are the hero Gotham needs - hell F'ing yes!	[REDACTED]
2022-04-14 11:31:08 (CDT)	Loved "ELON! You buying twitter or offering to buy twitter Wow! Now Don't you think we should sit down together face to face this is as the kids of today say a "gangsta move" I don't know know how shareholders turn this down ..like I said you are not like the other kids in the class"	Gayle King ([REDACTED]) Self ([REDACTED])
2022-04-14 11:58:19 (CDT)	You should raise your offer	Jason Calacanis ([REDACTED]) Jason Calacanis ([REDACTED]) Jason Calacanis ([REDACTED])
2022-04-14 11:58:25 (CDT)	\$54.21	Jason Calacanis ([REDACTED]) Jason Calacanis ([REDACTED]) Jason Calacanis ([REDACTED])
2022-04-14 11:58:37 (CDT)	The perfect counter	Jason Calacanis ([REDACTED])
2022-04-14 12:00:48 (CDT)	You could easily clean up bots and spam and make the service viable for many more users — Removing bots and spam is a lot less complicated than what the Tesla self driving team is doing (based on hearing the last edge case meeting)	Jason Calacanis ([REDACTED]) Jason Calacanis ([REDACTED])
2022-04-14 12:01:16 (CDT)	And why should blue check marks be limited to the elite, press and celebrities? How is that democratic?	Jason Calacanis ([REDACTED]) Jason Calacanis ([REDACTED])
2022-04-14 12:04:52 (CDT)	The Kingdom would like a word.. https://twitter.com/Aiwaleed_Talal/status/1514615956986757127?s=20&t=2q4VfMBXrIdYGj3vFN_r0w 🤖🤖	Jason Calacanis ([REDACTED]) Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-14 13:15:42 (CDT)	Elon, as you saw from our press release, the board is in receipt of your letter and is evaluating your proposal to determine the course of action that it believes is in the best interest of Twitter and all of its stockholders. We will be back in touch with you when we have completed that work. Bret	Bret Taylor ([REDACTED]) Self ([REDACTED])
2022-04-14 13:24:03 (CDT)	Sounds good	Bret Taylor ([REDACTED]) Self ([REDACTED])
2022-04-14 14:45:30 (CDT)	Our editor of Die Welt just gave an interview why he left Twitter. What he is criticising is exactly what you most likely want to change. I am thrilled to discuss twitters future when you are ready. So exciting.	Mathias Döpfner ([REDACTED]), Self ([REDACTED]) Mathias Döpfner ([REDACTED]) Self ([REDACTED])
2022-04-14 15:02:22 (CDT)	Interesting!	Self ([REDACTED])
2022-04-14 15:08:07 (CDT)	Hey Elon — my name is Jake Sherman. I'm a reporter with Punchbowl News in Washington — I cover Congress. Wonder if you're game to talk about how Twitter would change for politics if you were at the helm?	Self ([REDACTED])
2022-04-14 20:42:47 (CDT)	Would love you to buy Twitter and fix it. 🙏	Adeo Resse ([REDACTED]), Self ([REDACTED])

2022-04-14 20:43:50 (CDT)	Loved "Would love you to buy Twitter and fix it."	Self ([REDACTED])	Adeo Ressi	[REDACTED], Self ([REDACTED])
2022-04-15 16:50:46 (CDT)	Thank you for what you're doing. We all love you and are always behind you! Not having a global platform that is truly free speech is dangerous for all. Companies are all adopting some form of content moderation and it's all dependent on ownership on how it shifts and advertisers paying them, as you've said.	Omead Afshar	Omead Afshar ([REDACTED])	Self ([REDACTED])
2022-04-15 16:51:24 (CDT)	Who knew a Saudi Arabian prince had so much leverage and so much to say about twitter. Back of the envelope... Twitter revenue per employee: \$5B rev / 8k employees = \$625K rev per employee in 2021. Google revenue per employee: \$257B rev / 135K employees = \$1.9M per employee in 2021. Apple revenue per employee: \$365B rev / 154k employees = \$2.37M per employee in fiscal 2021.	Omead Afshar	[REDACTED]	[REDACTED]
2022-04-15 17:06:33 (CDT)	Twitter revenue per employee if 3k instead of 8k: \$5B rev / 3k employees = \$1.66m rev per employee in 2021 (more industry standard)	Jason Calacanis ([REDACTED])	Jason Calacanis	Self ([REDACTED])
2022-04-15 17:08:07 (CDT)	Emphasized "Back of the envelope... Twitter revenue per employee: \$5B rev / 8k employees = \$625K rev per employee in 2021. Google revenue per employee: \$257B rev / 135K employee = \$1.9M per employee in 2021. Apple revenue per employee: \$365B rev / 154k employees = \$2.37M per employee in fiscal 2021"	Jason Calacanis ([REDACTED])	Jason Calacanis	Self ([REDACTED])
2022-04-15 17:17:34 (CDT)	Insane potential for improvement	Self ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED]), Self ([REDACTED])
2022-04-15 17:17:48 (CDT)	<Attachment - image/gif - IMG_2241.GIF>	Self ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED]), Self ([REDACTED])
2022-04-15 17:21:45 (CDT)	Day zero	Jason Calacanis ([REDACTED])	Jason Calacanis	Self ([REDACTED]), Self ([REDACTED])
2022-04-15 17:21:45 (CDT)	Sharpen your blades boys	Jason Calacanis ([REDACTED])	Jason Calacanis	Self ([REDACTED]), Self ([REDACTED])
2022-04-15 17:22:12 (CDT)	2 day a week Office requirement = 20% voluntary departures	Jason Calacanis ([REDACTED])	Jason Calacanis	Self ([REDACTED]), Self ([REDACTED])
2022-04-15 17:22:59 (CDT)	https://twitter.com/jason/status/151509482337832448?s=10&t=CWr2U7sH4CuV0sahPeIKR	Jason Calacanis ([REDACTED])	Jason Calacanis	Self ([REDACTED]), Self ([REDACTED])
2022-04-15 17:28:58 (CDT)	I mean, the product road map is beyond obviously	Jason Calacanis ([REDACTED])	Jason Calacanis	Self ([REDACTED]), Self ([REDACTED])
2022-04-15 17:29:11 (CDT)	Premium feature abound... and twitter blue has exactly zero	Jason Calacanis ([REDACTED])	Jason Calacanis	Self ([REDACTED]), Self ([REDACTED])
2022-04-15 17:29:51 (CDT)	What committee came up with the list of dog shit features in Blue?!? It's worth paying to turn it off!	Jason Calacanis ([REDACTED])	Jason Calacanis	Self ([REDACTED]), Self ([REDACTED])
2022-04-15 17:30:23 (CDT)	Yeah, what an insane piece of shit!	Self ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED]), Self ([REDACTED])
2022-04-15 17:44:35 (CDT)	Maybe we don't talk twitter on twitter DM	Jason Calacanis ([REDACTED])	Jason Calacanis	Self ([REDACTED]), Self ([REDACTED])
2022-04-16 01:46:40 (CDT)	Was just thinking that haha	Self ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED]), Self ([REDACTED])
2022-04-16 01:49:49 (CDT)	Nothing said there so far is anything different from what I said publicly.	Self ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED]), Self ([REDACTED])

2022-04-16 01:51:10 (CDT)	Btw, Parag is still on a ten day vacation in Hawaii	Self ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-04-16 01:57:28 (CDT)	No reason to cut it short... in your first tour as ceo	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-04-16 01:57:33 (CDT)	(!!!)	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-04-16 01:57:46 (CDT)	Shouldn't he be in a war room right now?!	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-04-16 02:00:43 (CDT)	Does doing occasional zoom calls while drinking fruity cocktails at the Four Seasons count?	Self ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-04-16 02:16:42 (CDT)	☺️	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-04-16 14:01:16 (CDT)	Haha even Governor DeSantis just called me just now with ideas how to help you and outraged at that board and saying the public is rooting for you. Let me know if you or somebody on your side wants to chat w him. Would be fun to see you if you guys are around this weekend or the next few days.	Joe Lonsdale ([REDACTED])	Joe Lonsdale ([REDACTED])	Self ([REDACTED])
2022-04-16 14:12:04 (CDT)	Haha cool	Self ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-04-16 15:34:33 (CDT)	https://twitter.com/jason/status/1515427935263490053?s=10&t=1RQ_JlDXCDtHh0aXdGhJ5	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-04-16 15:34:33 (CDT)	I'm starting a DAO	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-04-16 15:34:36 (CDT)	👍👍	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-04-16 15:35:31 (CDT)	Money goes to buy twitter shares, if you don't wine money goes to open source twitter competitor 🤖🤖	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-04-16 16:05:22 (CDT)	Liked "Money goes to buy twitter shares, if you don't wine money goes to open source twitter competitor 🤖🤖"	Self ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-04-17 14:46:03 (CDT)	Elon, I am just checking in to reiterate that the board is seriously reviewing the proposal in your letter. We are working on a formal response as quickly as we can consistent with our fiduciary duties. Feel free to reach out anytime.	Bret Taylor ([REDACTED])	Bret Taylor ([REDACTED])	Self ([REDACTED])
2022-04-17 15:18:35 (CDT)	Liked "Elon, I am just checking in to reiterate that the board is seriously reviewing the proposal in your letter. We are working on a formal response as quickly as we can consistent with our fiduciary duties. Feel free to reach out anytime."	Self ([REDACTED])	Bret Taylor ([REDACTED])	Self ([REDACTED])
2022-04-17 20:28:45 (CDT)	You're calling Morgan Stanley to speak poorly of me ...	Self ([REDACTED])	Egon Durban ([REDACTED])	Self ([REDACTED])
2022-04-18 16:51:48 (CDT)	Maybe Oprah would be interested in joining the Twitter board if my bid succeeds. Wisdom about humanity and knowing what is right are more important than so-called "board governance" skills, which mean pretty much nothing in my experience.	Self ([REDACTED])	Gayle King ([REDACTED])	Self ([REDACTED])
2022-04-20 13:15:32 (CDT)	Any interest in participating in the Twitter deal?	Self ([REDACTED])	Larry Ellison ([REDACTED])	Self ([REDACTED])
2022-04-20 16:00:14 (CDT)	Not at all	Self ([REDACTED])	Brian Kingston ([REDACTED])	Self ([REDACTED])

2022-04-20 16:22:08 (CDT)	Yes...of course 👍	Larry Ellison	[REDACTED]	Larry Ellison	Self (
2022-04-20 16:22:57 (CDT)	Cool	Self ([REDACTED]	Larry Ellison	Self (
2022-04-20 16:23:58 (CDT)	Larry Ellison is interested in being part of the Twitter take-private	Self ([REDACTED]	Jared Birchall	Self (
2022-04-20 16:25:14 (CDT)	Roughly what dollar size? Not holding you to anything, but the deal is oversubscribed, so I have to reduce or kick out some participants.	Self ([REDACTED]	Larry Ellison	Self (
2022-04-20 16:26:19 (CDT)	A billion...or whatever you recommend	Larry Ellison	[REDACTED]	Larry Ellison	Self (
2022-04-20 16:28:23 (CDT)	Liked "Larry Ellison is interested in being part of the Twitter take-private "	Jared Birchall	[REDACTED]	Jared Birchall	Self (
2022-04-20 16:29:21 (CDT)	Whatever works for you. I'd recommend maybe \$2B or more. This has very high potential and I'd rather have you than anyone else.	Self ([REDACTED]	Larry Ellison	Self (
2022-04-20 17:42:16 (CDT)	I agree that it has huge potential... and it would be lots of fun	Larry Ellison	[REDACTED]	Larry Ellison	Self (
2022-04-20 18:14:49 (CDT)	Absolutely :	Self ([REDACTED]	Larry Ellison	Self (
2022-04-21 00:36:28 (CDT)	https://www.bloomberg.com/news/articles/2022-04-19/ftx-ceo-bankman-fried-wants-to-fix-social-media-with-blockchain	Jared Birchall	[REDACTED]	Jared Birchall	Self (
2022-04-21 00:36:29 (CDT)	<Attachment - text/vcard - Sam Bankman-Fried.vcf>	Jared Birchall	[REDACTED]	Jared Birchall	Self (
2022-04-21 00:36:50 (CDT)	He seems to point to a similar blockchain based idea	Jared Birchall	[REDACTED]	Jared Birchall	Self (
2022-04-21 00:38:02 (CDT)	Also, we now have the right software engineer for you to speak with about the blockchain idea. Do you want an intro? Or just contact info?	Jared Birchall	[REDACTED]	Jared Birchall	Self (
2022-04-21 01:29:15 (CDT)	Who is this person and who recommended them?	Self ([REDACTED]	Jared Birchall	Self (
2022-04-21 01:29:23 (CDT)	The engineer	Self ([REDACTED]	Jared Birchall	Self (
2022-04-21 01:29:28 (CDT)	I mean	Self ([REDACTED]	Jared Birchall	Self (
2022-04-21 01:30:16 (CDT)	The idea of blockchain free speech has been around for a long time. The questions are really about how to implement it.	Self ([REDACTED]	Jared Birchall	Self (
2022-04-21 01:37:55 (CDT)	former spaceX'r, current CTO at Matter Labs, a blockchain company. TBC is on the verge of hiring him.	Jared Birchall	[REDACTED]	Jared Birchall	Self (
2022-04-21 01:37:59 (CDT)	https://www.linkedin.com/in/anthonykrose/	Jared Birchall	[REDACTED]	Jared Birchall	Self (
2022-04-21 01:45:48 (CDT)	Ok	Self ([REDACTED]	Jared Birchall	Self (
2022-04-21 01:46:30 (CDT)	best to intro you via email?	Jared Birchall	[REDACTED]	Jared Birchall	Self (
2022-04-21 01:57:27 (CDT)	Yeah	Self ([REDACTED]	Jared Birchall	Self (

2022-04-21 21:52:26 (CDT)	Investor calls are currently scheduled from 1pm to 3pm. They'd like to do a brief check in beforehand.	Jared Birchall	Jared Birchall	Self (
2022-04-21 21:57:50 (CDT)	Ok	Self (Jared Birchall	Self (
2022-04-21 21:57:57 (CDT)	Whatever time works	Self (Jared Birchall	Self (
2022-04-21 22:17:24 (CDT)	Liked "Whatever time works"	Jared Birchall (Jared Birchall	Self (
2022-04-22 00:47:03 (CDT)	I'll be dialing in to the calls as well. Let me know if you prefer that I'm there in person at the house or if remote is better.	Jared Birchall (Jared Birchall	Self (
2022-04-22 02:46:16 (CDT)	Remote is fine	Self (Jared Birchall	Self (
2022-04-22 11:37:48 (CDT)	i have a twitter ceo candidate for you - bill gurvey/benchmark. they were early investors as well so know all the drama. want to meet him?	BL Lee	BL Lee	Self
2022-04-23 01:41:16 (CDT)	Thanks James, your unwavering support is deeply appreciated. Elon	Self (James Gorman	Self (
2022-04-23 01:41:36 (CDT)	I think the tender has a real chance	Self (James Gorman	Self (
2022-04-23 15:45:06 (CDT)	Would it be possible for you and me to talk this weekend?	Self (Bret Taylor	Self (
2022-04-23 15:48:30 (CDT)	Or any group of people from the Twitter and my side	Self (Bret Taylor	Self (
2022-04-23 17:30:41 (CDT)	Yes, that would be great. I would suggest me and Sam Britton from Goldman on our side. Do you have time this afternoon / evening?	Bret Taylor	Bret Taylor	Self (
2022-04-23 18:09:50 (CDT)	I REALLY hope you get Twitter. if you do, we should throw a hell of a party.	Joe Rogan (Joe Rogan (Self (
2022-04-23 18:11:56 (CDT)		Self (Joe Rogan (Self (
2022-04-23 18:13:16 (CDT)	Sounds good	Self (Bret Taylor	Self (
2022-04-23 18:13:41 (CDT)	Whatever time works for you and Sam is good for me	Self (Bret Taylor	Self (
2022-04-23 18:15:49 (CDT)	Can we call you in 15 mins? 4:30pm PT (not sure what time zone you are in)	Bret Taylor	Bret Taylor	Self (
2022-04-23 18:18:11 (CDT)	I can just call your mobile. Let me know if you prefer Zoom, conference call code, or something different	Bret Taylor	Bret Taylor	Self (
2022-04-23 18:23:43 (CDT)	Sure	Self	Bret Taylor (Self (
2022-04-23 18:23:48 (CDT)	Mobile is fine	Self	Bret Taylor	Self (
2022-04-23 18:25:11 (CDT)	Liked "Mobile is fine"	Bret Taylor	Bret Taylor	Self
2022-04-23 21:03:38 (CDT)	I will be universally beloved, since it is so easy to please everyone on twitter	Self (Jason Calacanis	Self

2022-04-23 21:04:30 (CDT)	It feels like everyone wants the same exact thing, and they will be patient and understanding of any changes... Twitter Stans are a reasonable, good faith bunch	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:06:51 (CDT)	These dipshits spent a years on twitter blue to give people exactly... Nothing they want!	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:07:10 (CDT)	Splitting revenue with video creators like YouTube could be huge unlock	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:07:28 (CDT)	We could literally give video creators 100% of their ad revenue up to \$1m then do split	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:07:31 (CDT)	Absolutely	Self ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:17:25 (CDT)	5 Teams: 5 Northstar metrics 1. Legacy Opps: uptime, speed 2. Membership team: remove bots while getting users to pay for "Real Name Memberships" \$5 a month, \$50 a year. Includes 24 hours response to customer service 3. Payments: % of users that have connected a bank account/made a deposit 4. Creator Team: get creators to publish to twitter first (musicians, YouTubers, tiktokers, etc) by giving them the best % split in the industry (and promotion) 5. Transparency Team: make the Algorithm & Moderation understandable and fair	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:18:49 (CDT)	I think those are the 5 critical pieces... everyone agrees to "year one" sprint, including coming back to offices within the first 60 days (unless given special dispensation for extraordinary contribution)	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:19:22 (CDT)	Hard Reboot the organization	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:20:09 (CDT)	Feels like no one is setting priorities ruthlessly.. 12,000 working on whatever they want?!? No projects being cancelled!	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:21:12 (CDT)	Move HQ to Austin, rent gigafactory excess space	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:24:10 (CDT)	Want to be a strategic advisor if this works out?	Self ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:24:24 (CDT)	Want to be a strategic advisor to Twitter if this works out?	Self ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:25:06 (CDT)	100%	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:25:29 (CDT)	Board member, advisor, whatever... you have my sword	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:25:35 (CDT)	Loved "Board member, advisor, whatever... you have my sword"	Self ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:26:17 (CDT)	if 2, 3 or 4 unlock they are each 250b+ markets	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:26:41 (CDT)	Payments is \$250-500b, YouTube/creators is \$250b+	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:28:31 (CDT)	Membership no one has tried really.... So hard to estimate. 1-5m paid members maybe @ \$50-100 a year? 250k corporate memberships @ 10k a year?	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:36:33 (CDT)	You are a mind reader	Self ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])

2022-04-23 21:40:44 (CDT)	Put me in the game coach!	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:40:48 (CDT)	☺	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:41:29 (CDT)	Twitter CEO is my dream job	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:43:39 (CDT)	https://apple.news/AIDqJaC24Sgyu9S9krWlIj we should get Mr Beast to create for twitter... we need to win the next two generations (millennials and Z are "melt" on twitter)	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:43:39 (CDT)		Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 21:56:38 (CDT)	For sure	Self ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-23 22:01:45 (CDT)	For sure	Mike Pop ([REDACTED])	Mike Pop ([REDACTED]), Self ([REDACTED])
2022-04-23 22:01:58 (CDT)	defiantly things can be better and more culturally engaged	Mike Pop ([REDACTED])	Mike Pop ([REDACTED]), Self ([REDACTED])
2022-04-23 22:19:30 (CDT)	I think you're in a unique position to broker better AI to detect bots the second they pop up	Mike Pop ([REDACTED])	Mike Pop ([REDACTED]), Self ([REDACTED])
2022-04-23 22:23:13 (CDT)	Liked "I think you're in a unique position to broker better AI to detect bots the second they pop up"	Self ([REDACTED])	Mike Pop ([REDACTED]), Self ([REDACTED])
2022-04-24 13:27:37 (CDT)	Just tried calling — please call whenever you are available	Bret Taylor ([REDACTED])	Bret Taylor ([REDACTED]), Self ([REDACTED])
2022-04-24 14:56:04 (CDT)	Calling shortly	Self ([REDACTED])	Bret Taylor ([REDACTED]), Self ([REDACTED])
2022-04-24 14:58:59 (CDT)	Great thanks	Bret Taylor ([REDACTED])	Bret Taylor ([REDACTED]), Self ([REDACTED])
2022-04-24 15:00:39 (CDT)	Morgan Stanley needs to talk to me. I will call as soon as that's done.	Self ([REDACTED])	Bret Taylor ([REDACTED]), Self ([REDACTED])
2022-04-24 15:01:32 (CDT)	No problem - here when you are ready	Bret Taylor ([REDACTED])	Bret Taylor ([REDACTED]), Self ([REDACTED])
2022-04-24 15:01:40 (CDT)	Liked "No problem - here when you are ready"	Self ([REDACTED])	Bret Taylor ([REDACTED]), Self ([REDACTED])
2022-04-24 18:21:06 (CDT)	I understand our advisors just had a productive call. I am available to speak after you've debriefed with them.	Bret Taylor ([REDACTED])	Bret Taylor ([REDACTED]), Self ([REDACTED])
2022-04-24 18:25:20 (CDT)	Sounds good	Self ([REDACTED])	Bret Taylor ([REDACTED]), Self ([REDACTED])
2022-04-24 22:44:44 (CDT)	Since you think I should come in for at least \$28... I'm in for \$28 🙌	Larry Ellison ([REDACTED])	Larry Ellison ([REDACTED]), Self ([REDACTED])
2022-04-24 22:51:09 (CDT)	Haha thanks :)	Self ([REDACTED])	Larry Ellison ([REDACTED]), Self ([REDACTED])
2022-04-24 22:56:54 (CDT)	Do you want to participate in the twitter transaction?	Self ([REDACTED])	Kimbal Musk ([REDACTED]), Self ([REDACTED])
2022-04-24 23:00:37 (CDT)	Let's discuss tomorrow	Kimbal Musk ([REDACTED])	Kimbal Musk ([REDACTED]), Self ([REDACTED])
2022-04-24 23:01:01 (CDT)	Ok	Self ([REDACTED])	Kimbal Musk ([REDACTED]), Self ([REDACTED])

2022-04-24 23:01:07 (CDT)	I can break away from my group a lot of the time. Will text tomorrow afternoon and if you're free we can meet up	Kimbal Musk ([REDACTED]), Self ([REDACTED])
2022-04-24 23:02:19 (CDT)	Ok	Kimbal Musk ([REDACTED]), Self ([REDACTED])
2022-04-24 23:19:48 (CDT)	Hi E, looks like a TWITTER board member scurrying around unbalanced trying to deal with your offer... Am loving your tactics, (vid taken from my house on Monica beach)-Brad	Dr. Jabour ([REDACTED]), Self ([REDACTED])
2022-04-24 23:28:45 (CDT)	Loved "Hi E, looks like a TWITTER board member scurrying around unbalanced trying to deal with your offer.... Am loving your tactics, (vid taken from my house on Monica beach)-Brad"	Dr. Jabour ([REDACTED]), Self ([REDACTED])
2022-04-25 01:22:28 (CDT)	Time for a quick check in?	Bret Taylor ([REDACTED]), Self ([REDACTED])
2022-04-25 08:05:12 (CDT)	Will call you back	Bret Taylor ([REDACTED]), Self ([REDACTED])
2022-04-25 08:05:15 (CDT)	In a bit	Bret Taylor ([REDACTED]), Self ([REDACTED])
2022-04-25 08:05:18 (CDT)	Ok	Bret Taylor ([REDACTED]), Self ([REDACTED])
2022-04-25 13:29:45 (CDT)	Can I call you later?	Parag ([REDACTED]), Self ([REDACTED])
2022-04-25 13:30:40 (CDT)	I have the SpaceX exec staff meeting right now. Will be done in half an hour. Do you need to talk before then?	Parag ([REDACTED]), Self ([REDACTED])
2022-04-25 13:30:54 (CDT)	No - can talk in 30!	Parag ([REDACTED]), Self ([REDACTED])
2022-04-25 13:33:09 (CDT)	Liked "No - can talk in 30!"	Parag ([REDACTED]), Self ([REDACTED])
2022-04-25 13:53:59 (CDT)	Thank you ☺	jack jack ([REDACTED]), Self ([REDACTED])
2022-04-25 13:56:43 (CDT)	https://twitter.com/btaylor/status/1518664708177362944?s=10&t=9WqIC5ZVMQdyCp3l4T	Bret Taylor ([REDACTED]), Self ([REDACTED])
2022-04-25 13:56:56 (CDT)	Loved "https://twitter.com/btaylor/status/1518664708177362944?s=10&t=9WqIC5ZVMQdyCp3l4T" 2Lw"	Bret Taylor ([REDACTED]), Self ([REDACTED])
2022-04-25 13:57:01 (CDT)	Thank you	Bret Taylor ([REDACTED]), Self ([REDACTED])
2022-04-25 13:57:10 (CDT)	Loved "Thank you ☺"	jack jack ([REDACTED]), Self ([REDACTED])
2022-04-25 13:57:23 (CDT)	Here to make this successful in any way I can	Bret Taylor ([REDACTED]), Self ([REDACTED])
2022-04-25 13:57:25 (CDT)	I basically following your advice!	jack jack ([REDACTED]), Self ([REDACTED])
2022-04-25 13:57:54 (CDT)	Liked "Here to make this successful in any way I can"	Bret Taylor ([REDACTED]), Self ([REDACTED])
2022-04-25 13:59:08 (CDT)	I know and I appreciate you. This is the right and only path. I'll continue to do whatever it takes to make it work.	jack jack ([REDACTED]), Self ([REDACTED])
2022-04-25 14:00:03 (CDT)	Liked "I know and I appreciate you. This is the right and only path. I'll continue to do whatever it takes to make it work."	jack jack ([REDACTED]), Self ([REDACTED])
2022-04-25 14:21:03 (CDT)	Hell yeah!!	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-25 14:21:26 (CDT)	It will take a few months for the deal to complete before I'm actually in control	Jason Calacanis ([REDACTED]), Self ([REDACTED])

2022-04-25 14:21:44 (CDT)	Absolutely	Self ([REDACTED])	Tim Urban ([REDACTED]), Self ([REDACTED])
2022-04-25 15:12:00 (CDT)	Just had the best idea ever for monetization... if you pay .01 per follower per year, you can DM all your followers up to 1x a day.	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-25 15:12:22 (CDT)	500,000 follows = \$5,000 and I DM them when I have new podcast episode, or I'm doing an event... or my new book comes out	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-25 15:14:37 (CDT)	And let folks slice and dice... so, you could DM all your twitter followers in Berlin and invite them to the GigaRave	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-25 15:14:55 (CDT)	Oh my lord this would unlock the power of Twitter and goose revenue massively.... Who wouldn't pay for this!?!?	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-25 15:15:37 (CDT)	and if you over use the tool and are annoying folks would unfollow you... so it's got a built in safe guard (unlike email spam)	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-25 15:16:11 (CDT)	Imagine we ask Justin Beaver to come back and let him DM his fans... he could sell \$10m in merchandise or tickets instantly. Would be INSANE for power users and companies	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED]), Self ([REDACTED])
2022-04-25 18:36:57 (CDT)	Do you have 5 minutes to connect on possible meeting tomorrow I believe you will want to take ?	Michael Grimes ([REDACTED])	Michael Grimes ([REDACTED]), Self ([REDACTED])
2022-04-25 18:39:47 (CDT)	Will call in about half an hour	Self ([REDACTED])	Michael Grimes ([REDACTED]), Self ([REDACTED])
2022-04-25 19:16:35 (CDT)	Sam Bankman Fried is why I'm calling https://twitter.com/sbf_fbx/status/1514588820641128452 https://www.vox.com/platform/amp/encode/2021/3/20/22335209/sam-bankman-fried-joe-biden-fx-cryptocurrency-effective-altruism https://fbx.us	Michael Grimes ([REDACTED])	Michael Grimes ([REDACTED]), Self ([REDACTED])
2022-04-25 19:48:06 (CDT)	??	Self ([REDACTED])	Michael Grimes ([REDACTED]), Self ([REDACTED])
2022-04-25 19:48:37 (CDT)	I'm backlogged with a mountain of critical work matters. Is this urgent?	Self ([REDACTED])	Michael Grimes ([REDACTED]), Self ([REDACTED])
2022-04-25 19:48:43 (CDT)	Wants 1-5b. Serious about partner w/you. Same security you own	Michael Grimes ([REDACTED])	Michael Grimes ([REDACTED]), Self ([REDACTED])
2022-04-25 19:49:10 (CDT)	Not urgent unless you want him to fly tomorrow. He has a window tomorrow then he's wed-Friday booked	Michael Grimes ([REDACTED])	Michael Grimes ([REDACTED]), Self ([REDACTED])
2022-04-25 19:52:44 (CDT)	Could do 5bn if everything vision lock. Would do the engineering for social media blockchain integration. Founded FTX crypto exchange. Believes in your mission. Major Democratic donor. So thought it was potentially worth an hour tomorrow a la the Orlando meeting and he said he could shake hands on 5 if you like him and I think you will. Can talk when you have more time not urgent but if tomorrow works it could get us 5bn equity in an hour	Michael Grimes ([REDACTED])	Michael Grimes ([REDACTED]), Self ([REDACTED])
2022-04-25 19:54:37 (CDT)	Blockchain twitter isn't possible, as the bandwidth and latency requirements cannot be supported by a peer to peer network, unless those "peers" are absolutely gigantic, thus defeating the purpose of a decentralized network.	Self ([REDACTED])	Michael Grimes ([REDACTED]), Self ([REDACTED])

2022-04-25 19:54:52 (CDT)	Disliked "Could do 5bn if everything vision lock. Would do the engineering for social media blockchain integration. Founded FTX crypto exchange. Believes in your mission. Major Democratic donor. So thought it was potentially worth an hour tomorrow a la the Orlando meeting and he said he could shake hands on 5 if you like him and I think you will. Can talk when you have more time not urgent but if tomorrow works it could get us 5bn equity in an hour"	Self ([REDACTED])	Michael Grimes ([REDACTED]), Self ([REDACTED])
2022-04-25 20:01:48 (CDT)	So long as I don't have to have a laborious blockchain debate	Self ([REDACTED])	Michael Grimes ([REDACTED]), Self ([REDACTED])
2022-04-25 20:05:28 (CDT)	Strange that Orlando declined	Self ([REDACTED])	Michael Grimes ([REDACTED]), Self ([REDACTED])
2022-04-25 20:07:22 (CDT)	Please let him know that I would like to talk and understand why he declined	Self ([REDACTED])	Michael Grimes ([REDACTED]), Self ([REDACTED])
2022-04-25 20:08:00 (CDT)	Does Sam actually have \$38 liquid? I think Sam has it yes. He actually said up to 10 at one point but in writing he said up to 5. He's into you. And he specifically said the blockchain piece is only if you liked it and not gonna push it. Orlando referred Sams interest to us and will be texting you to speak to say why he (Orlando) declined. We agree orlando needs to call you and explain given everything he said to us and you. Will make that happen We can push Sam to next week but I do believe you will like him. Ultra Genius and doer builder like your formula. Built FTX from scratch after MIT physics. Second to Bloomberg in donations to Biden campaign. https://twitter.com/dineshdSouza/status/1518744328205647872?s=10&t=VkaqBUrlJexF_SJD	Michael Grimes ([REDACTED])	Michael Grimes ([REDACTED]), Self ([REDACTED])
2022-04-25 21:58:30 (CDT)	OC LUW	Self ([REDACTED])	David Sacks ([REDACTED]), Self ([REDACTED])
2022-04-25 22:00:53 (CDT)	RT'd	David Sacks ([REDACTED])	David Sacks ([REDACTED]), Self ([REDACTED])
2022-04-26 09:32:52 (CDT)	I want to make sure Parag is doing everything possible to build towards your goals until close. He is really great at getting things done when tasked with specific direction. Would it make sense for me you and him to get on a call to discuss next steps and get really clear on what's needed? He'd be able to move fast and clear then. Everyone is aligned and this will help even more.	jack jack ([REDACTED])	jack jack ([REDACTED]), Self ([REDACTED])
2022-04-26 12:12:01 (CDT)	Sure	Self ([REDACTED])	jack jack ([REDACTED]), Self ([REDACTED])
2022-04-26 13:33:39 (CDT)	When do I start boss	Mike Pop ([REDACTED])	Mike Pop ([REDACTED]), Self ([REDACTED])
2022-04-26 13:38:02 (CDT)	It will take at least a few months to close the deal	Self ([REDACTED])	Mike Pop ([REDACTED]), Self ([REDACTED])
2022-04-26 13:40:58 (CDT)	Loved "it will take at least a few months to close the deal"	Mike Pop ([REDACTED])	Mike Pop ([REDACTED]), Self ([REDACTED])
2022-04-26 13:59:18 (CDT)	Good question ... https://twitter.com/norsemen62/status/1519005154204336128?s=10&t=MKYf6Wu2sTdd	Self ([REDACTED])	Parag ([REDACTED]), Self ([REDACTED])
2022-04-26 13:59:21 (CDT)	WWqTheDg	Self ([REDACTED])	Parag ([REDACTED]), Self ([REDACTED])
2022-04-26 14:44:10 (CDT)	great when is best for you? And please let me know where/if you want my help. I just want to make this amazing and feel bound to it	jack jack ([REDACTED])	jack jack ([REDACTED]), Self ([REDACTED])
2022-04-26 14:46:00 (CDT)	How about 7pm Central?	Self ([REDACTED])	jack jack ([REDACTED]), Self ([REDACTED])
2022-04-26 14:46:07 (CDT)	Your help would be much appreciated	Self ([REDACTED])	jack jack ([REDACTED]), Self ([REDACTED])
2022-04-26 14:46:16 (CDT)	I agreed with everything you said to me	Self ([REDACTED])	jack jack ([REDACTED]), Self ([REDACTED])
2022-04-26 14:48:07 (CDT)	Great! Will set up. I won't let this fail and will do whatever it takes. It's too critical to humanity.	jack jack ([REDACTED])	jack jack ([REDACTED]), Self ([REDACTED])

2022-04-26 15:32:34 (CDT)	Absolutely	Self ([REDACTED])	jack jack	Self ([REDACTED])
2022-04-26 17:10:35 (CDT)	<Attachment - image/jpeg - Screen Shot 2022-04-26 at 15.05.00.jpeg> I put together a draft list to make the discussion efficient. Goal is to align around 1) problems we're trying to solve, 2) long term priorities, 3) short-term actions, all using a higher level guide you spoke about. Think about what you'd add/remove. Getting this nailed will increase velocity.	jack jack	jack jack	Self ([REDACTED])
2022-04-26 17:10:35 (CDT)	Here's meeting link for 7pm your time	jack jack	jack jack	Self ([REDACTED])
2022-04-26 17:11:27 (CDT)	https://meet.google.com/twd-atpe-vwb	jack jack	jack jack	Self ([REDACTED])
2022-04-26 17:11:42 (CDT)	Great list of actions	Self ([REDACTED])	jack jack	Self ([REDACTED])
2022-04-26 17:14:56 (CDT)	Justin Amash (former congressman who's libertarian and good on free speech) asked for an intro to you: "I believe I can be helpful to Twitter's team going forward—thinking about how to handle speech and moderation, how that intersects with ideas about governance, how to navigate actual government (including future threats to Section 230), etc.—and I'd love to connect with Elon if he's interested in connecting (I don't have a direct way to contact him). I believe my experience and expertise can be useful, and my general outlook aligns with his stated goals. Thanks. All the best." Please LMK if you want to connect with him.	David Sacks ([REDACTED])	David Sacks ([REDACTED])	David Sacks ([REDACTED]), Self ([REDACTED])
2022-04-26 17:15:07 (CDT)	https://twitter.com/justinamash?s=21&t=Owbgwdot7JpUc4rLUXYf	David Sacks ([REDACTED])	David Sacks ([REDACTED])	David Sacks ([REDACTED]), Self ([REDACTED])
2022-04-26 17:16:09 (CDT)	I don't own twitter yet	Self ([REDACTED])	David Sacks ([REDACTED])	David Sacks ([REDACTED]), Self ([REDACTED])
2022-04-26 17:16:42 (CDT)	Thank you. I will link you up. Also will call when some of the dust settles. Hope all's ok	James Murdoch ([REDACTED])	James Murdoch ([REDACTED])	James Murdoch ([REDACTED]), Self ([REDACTED])
2022-04-26 17:17:32 (CDT)	liked "Thank you. I will link you up. Also will call when some of the dust settles. Hope all's ok"	Self ([REDACTED])	James Murdoch ([REDACTED])	James Murdoch ([REDACTED]), Self ([REDACTED])
2022-04-26 17:18:41 (CDT)	Understood.	David Sacks ([REDACTED])	David Sacks ([REDACTED])	David Sacks ([REDACTED]), Self ([REDACTED])
2022-04-26 19:01:45 (CDT)	We're on hangout whenever you're ready. No rush. Just working on refining doc.	jack jack	jack jack	Self ([REDACTED])
2022-04-26 19:02:03 (CDT)	Liked "We're on hangout whenever you're ready. No rush. Just working on refining doc."	Self ([REDACTED])	jack jack	Self ([REDACTED])
2022-04-26 19:03:19 (CDT)	It's asking me for a Google account login	Self ([REDACTED])	jack jack	Self ([REDACTED])
2022-04-26 20:02:22 (CDT)	On a call. Free in ~30 mins.	Self ([REDACTED])	Antonio Gracias ([REDACTED])	Antonio Gracias ([REDACTED]), Self ([REDACTED])
2022-04-26 20:04:30 (CDT)	You and I are in complete agreement. Parag is just moving far too slowly and trying to please people who will not be happy no matter what he does.	Self ([REDACTED])	jack jack	Self ([REDACTED])
2022-04-26 20:24:15 (CDT)	Ok. I'll call you in 30	Antonio Gracias ([REDACTED])	Antonio Gracias ([REDACTED])	Antonio Gracias ([REDACTED]), Self ([REDACTED])
2022-04-26 20:30:04 (CDT)	Will you bring back Jack?	Kathryn Murdoch ([REDACTED])	James Murdoch ([REDACTED])	James Murdoch ([REDACTED]), Kathryn Murdoch ([REDACTED]), Self ([REDACTED])
2022-04-26 20:30:39 (CDT)	Jack doesn't want to come back. He is focused on Bitcoin.	Self ([REDACTED])	James Murdoch ([REDACTED])	James Murdoch ([REDACTED]), Kathryn Murdoch ([REDACTED]), Self ([REDACTED])
2022-04-26 21:56:22 (CDT)	At least it became clear that you can't work together. That was clarifying.	jack jack	jack jack	Self ([REDACTED])
2022-04-26 21:57:34 (CDT)	Yeah	Self ([REDACTED])	jack jack	Self ([REDACTED])

2022-04-27 18:46:06 (CDT)	Hi Elon, This is Maddie, Larry Ellison's assistant. Larry asked that I connect the head of his family office, Paul Marinelli, with the head of yours. Would you please share their contact details? Alternatively, please provide them with Paul's Cell: 408-483-5041 Email: paulim@lawrenceinv.com			Self ([REDACTED]), Self ([REDACTED]), Self ([REDACTED])
2022-04-27 18:56:01 (CDT)	Jared@excession.com	Self ([REDACTED])		Self ([REDACTED]), Self ([REDACTED]), Self ([REDACTED])
2022-04-27 18:57:20 (CDT)	Thank you.			
2022-04-27 20:00:40 (CDT)	i haven't officially started my podcast yet but if you think it would be helpful, i'd be happy to record a conversation with you about twitter to ask some of the most common questions and let you expand upon your thoughts	Tim Urban ([REDACTED])		Tim Urban ([REDACTED]), Self ([REDACTED])
2022-04-27 20:00:53 (CDT)	but only if it would be helpful to you	Tim Urban ([REDACTED])		Tim Urban ([REDACTED]), Self ([REDACTED])
2022-04-27 20:03:54 (CDT)	Happy to talk about it if this is interesting: Twitter conversational OS—the townsquare for your digital life.	Marc Benioff ([REDACTED])		Marc Benioff ([REDACTED]), Self ([REDACTED])
2022-04-27 20:21:20 (CDT)	Well I don't own it yet	Self ([REDACTED])		Marc Benioff ([REDACTED]), Self ([REDACTED])
2022-04-27 20:21:29 (CDT)	Suee	Self ([REDACTED])		Tim Urban ([REDACTED]), Self ([REDACTED])
2022-04-27 20:33:25 (CDT)	Any day or time that's best for you? And best location? I'm in LA but can zip over to Austin if you're there.	Tim Urban ([REDACTED])		Tim Urban ([REDACTED]), Self ([REDACTED])
2022-04-27 20:39:13 (CDT)	Probably in a few weeks	Self ([REDACTED])		Tim Urban ([REDACTED]), Self ([REDACTED])
2022-04-27 20:44:26 (CDT)	Liked "Probably in a few weeks"	Tim Urban ([REDACTED])		Tim Urban ([REDACTED]), Self ([REDACTED])
2022-04-27 21:30:05 (CDT)	Great. I will put you in touch with Satya.	Reid Hoffman ([REDACTED])		Reid Hoffman ([REDACTED]), Self ([REDACTED])
2022-04-27 21:30:39 (CDT)	Sounds good	Self ([REDACTED])		Reid Hoffman ([REDACTED]), Self ([REDACTED])
2022-04-27 21:30:47 (CDT)	From a social perspective - Twitter allowing for high quality video uploads (1080p at a minimum) & adding a basic in-app video editor would have quite a big impact I think. Especially useful for citizen journalism & fun educational content. Might even help Twitter regain market share lost to TikTok	Viv Hantusch ([REDACTED])		Viv Hantusch ([REDACTED]), Self ([REDACTED])
2022-04-27 21:30:57 (CDT)	Do you want to invest in Twitter take private?	Self ([REDACTED])		Reid Hoffman ([REDACTED]), Self ([REDACTED])
2022-04-27 21:31:12 (CDT)	Agreed	Self ([REDACTED])		Viv Hantusch ([REDACTED]), Self ([REDACTED])
2022-04-27 21:31:40 (CDT)	Twitter can't monetize video yet, so video is a loss for Twitter and for the those who post	Self ([REDACTED])		Viv Hantusch ([REDACTED]), Self ([REDACTED])
2022-04-27 21:31:56 (CDT)	Twitter needs better guidance	Self ([REDACTED])		Viv Hantusch ([REDACTED]), Self ([REDACTED])
2022-04-27 21:33:05 (CDT)	Elon, Satya: as indicated, this connects the two of you by text and phone.	Reid Hoffman ([REDACTED])		Satya ([REDACTED]), Reid Hoffman ([REDACTED]), Self ([REDACTED])
2022-04-27 21:34:04 (CDT)	It's way beyond my resources. I presume you are not interested in venture 5.	Reid Hoffman ([REDACTED])		Reid Hoffman ([REDACTED]), Self ([REDACTED])

2022-04-27 21:35:22 (CDT)	Yeah, 100%	Viv Hantusch ([REDACTED])	Viv Hantusch ([REDACTED]), Self ([REDACTED])
2022-04-27 21:36:01 (CDT)	Thx Reid. Elon - will text and coordinate a time to chat. Thx	Satya ([REDACTED])	Satya ([REDACTED]), Reid Hoffman ([REDACTED])
2022-04-27 21:37:55 (CDT)	They should have a subscription that's actually useful (unlike Twitter Blue haha)	Viv Hantusch ([REDACTED])	Viv Hantusch ([REDACTED]), Self ([REDACTED])
2022-04-27 21:39:38 (CDT)	Hi Elon... Let me know when you have time to chat. Can do tomorrow evening or weekend.	Satya ([REDACTED])	Satya ([REDACTED]), Self ([REDACTED])
2022-04-27 21:40:12 (CDT)	Look forward to it. Thx Satya	Self ([REDACTED])	Self ([REDACTED]), Self ([REDACTED])
2022-04-27 21:40:36 (CDT)	I can talk now if you want	Self ([REDACTED])	Self ([REDACTED]), Self ([REDACTED])
2022-04-27 21:40:40 (CDT)	Totally	Self ([REDACTED])	Self ([REDACTED]), Self ([REDACTED])
2022-04-27 22:01:46 (CDT)	Calling	Satya ([REDACTED])	Satya ([REDACTED]), Self ([REDACTED])
2022-04-27 22:02:10 (CDT)	Thx for the chat. Will stay in touch. And will for sure follow-up on Teams feedback!	Satya ([REDACTED])	Satya ([REDACTED]), Self ([REDACTED])
2022-04-27 22:02:21 (CDT)	There is plenty of financial support, but you're a friend, so just letting you know you'd get priority. VC money is fine if you want.	Self ([REDACTED])	Reid Hoffman ([REDACTED]), Self ([REDACTED])
2022-04-27 23:23:03 (CDT)	Sounds good :) Trying to figure out what to do with Twitter DMs. They should be end to end encrypted (obv). Dunno if better to have redundancy with Signal or integrate it.	Self ([REDACTED])	Self ([REDACTED]), Self ([REDACTED])
2022-04-28 12:11:45 (CDT)	I'd like to convey some critical elements of the transition plan. Is there a good time for us to talk tonight? Happy to have anyone from Twitter on the call.	Self ([REDACTED])	Brian Acton ([REDACTED]), Self ([REDACTED])
2022-04-28 12:11:46 (CDT)	Very cool! OK - if I were to put together \$, what size could you make available? 😊	Bret Taylor ([REDACTED])	Bret Taylor ([REDACTED]), Self ([REDACTED])
2022-04-28 12:12:58 (CDT)	My biggest concern is headcount and expense growth. Twitter has ~3X the head count per unit of revenue of other social media companies, which is very unhealthy in my view.	Reid Hoffman ([REDACTED])	Reid Hoffman ([REDACTED]), Self ([REDACTED])
2022-04-28 12:13:21 (CDT)	Whatever you'd like. I will just cut back others.	Self ([REDACTED])	Self ([REDACTED]), Self ([REDACTED])
2022-04-28 12:13:55 (CDT)	I would need to know the approximate by next week	Self ([REDACTED])	Reid Hoffman ([REDACTED]), Self ([REDACTED])
2022-04-28 12:22:16 (CDT)	What would be the largest \$ that would be ok? I consulted with our LPs, and I have strong demand. Would be fun!	Reid Hoffman ([REDACTED])	Reid Hoffman ([REDACTED]), Self ([REDACTED])
2022-04-28 12:33:56 (CDT)	\$2B?	Self ([REDACTED])	Reid Hoffman ([REDACTED]), Self ([REDACTED])
2022-04-28 12:46:11 (CDT)	Great. Probably doable - let me see.	Reid Hoffman ([REDACTED])	Reid Hoffman ([REDACTED]), Self ([REDACTED])
2022-04-28 12:50:08 (CDT)	Can be less if easier. The round is oversubscribed, so I just have to tell other investors what their allocation is ideally by early next week.	Self ([REDACTED])	Reid Hoffman ([REDACTED]), Self ([REDACTED])
2022-04-28 14:22:12 (CDT)	Elon - connecting you with SBF.	Jared Birchall ([REDACTED])	Jared Birchall ([REDACTED]), Sam BF ([REDACTED])
2022-04-28 14:27:09 (CDT)	Hey!	Sam BF ([REDACTED])	Jared Birchall ([REDACTED]), Sam BF ([REDACTED])
2022-04-28 15:38:10 (CDT)	Should I connect you with the Morgan Stanley team?	Self ([REDACTED])	Reid Hoffman ([REDACTED]), Self ([REDACTED])
2022-04-28 15:38:40 (CDT)	Yes please. Especially with the terms, etc. I know Michael Grimes, btw.	Reid Hoffman ([REDACTED])	Reid Hoffman ([REDACTED]), Self ([REDACTED])

2022-04-28 16:07:02 (CDT)	Do you and/or find want to invest in the take private?	Self ([REDACTED])	David Sacks ([REDACTED]), Self ([REDACTED])
2022-04-28 16:07:06 (CDT)	*fund	Self ([REDACTED])	David Sacks ([REDACTED]), Self ([REDACTED]), Reid Hoffman ([REDACTED]), Self ([REDACTED])
2022-04-28 16:08:01 (CDT)	Please feel free to call him directly	Self ([REDACTED])	Jared Birchall ([REDACTED]), Reid Hoffman ([REDACTED]), Self ([REDACTED])
2022-04-28 16:08:44 (CDT)	Connecting Reid Hoffman and Jared Birchall. Jared runs my family office.	Self ([REDACTED])	Reid Hoffman ([REDACTED]), Self ([REDACTED]), Self ([REDACTED])
2022-04-28 16:09:22 (CDT)	OK - I'll do that. (Trying to simplify your massively busy life.)	Reid Hoffman ([REDACTED])	Reid Hoffman ([REDACTED]), Self ([REDACTED])
2022-04-28 16:14:13 (CDT)	The Morgan Stanley deal team is truly excellent and I don't say such things lightly.	Self ([REDACTED])	Michael Kives ([REDACTED]), Self ([REDACTED])
2022-04-28 16:42:35 (CDT)	Twitter is obviously not going to be turned into some right wing nuthouse. Aiming to be as broadly inclusive as possible. Do the right thing for vast majority of Americans.	Self ([REDACTED])	Michael Kives ([REDACTED]), Self ([REDACTED])
2022-04-28 16:45:43 (CDT)	Liked "Twitter is obviously not going to be turned into some right wing nuthouse. Aiming to be as broadly inclusive as possible. Do the right thing for vast majority of Americans."	Michael Kives ([REDACTED])	Jared Birchall ([REDACTED]), Reid Hoffman ([REDACTED])
2022-04-28 17:05:02 (CDT)	Very nice to connect, Reid. What is the best email to reach you at?	Jared Birchall ([REDACTED])	Jared Birchall ([REDACTED]), Self ([REDACTED]), Reid Hoffman ([REDACTED])
2022-04-28 17:05:21 (CDT)	rhoffman@greylock.com Thx! And nice to meet.	Reid Hoffman ([REDACTED])	Jared Birchall ([REDACTED]), Self ([REDACTED]), Reid Hoffman ([REDACTED])
2022-04-28 17:05:33 (CDT)	Liked "rhoffman@greylock.com Thx! And nice to meet."	Jared Birchall ([REDACTED])	Jared Birchall ([REDACTED]), Self ([REDACTED]), Reid Hoffman ([REDACTED])
2022-04-28 17:05:50 (CDT)	Indeed! I took LJ public and the MSFT-LJ deal with them!	Reid Hoffman ([REDACTED])	Reid Hoffman ([REDACTED]), Self ([REDACTED])
2022-04-28 18:10:00 (CDT)	Yes but I don't have a vehicle for it (Craft is venture) so either I need to set up an SPV or just do it personally. If the latter, my amount would be mice-nuts in relative terms but I would be happy to participate to support the cause.	David Sacks ([REDACTED])	David Sacks ([REDACTED]), Self ([REDACTED])
2022-04-28 18:13:34 (CDT)	Up to you	Self ([REDACTED])	David Sacks ([REDACTED]), Self ([REDACTED])
2022-04-28 18:14:20 (CDT)	Ok cool, let me know.	David Sacks ([REDACTED])	David Sacks ([REDACTED]), Self ([REDACTED])
2022-04-28 18:15:09 (CDT)	I'm in personally and will raise an SPV too if that works for you.	David Sacks ([REDACTED])	David Sacks ([REDACTED]), Self ([REDACTED])
2022-04-28 18:27:59 (CDT)	Sure	Self ([REDACTED])	David Sacks ([REDACTED]), Self ([REDACTED]), Self ([REDACTED])
2022-04-29 19:15:35 (CDT)	https://www.linkedin.com/in/emilmichael/	Steve Jurvetson ([REDACTED])	Steve Jurvetson ([REDACTED]), Self ([REDACTED])
2022-04-29 19:15:35 (CDT)	If you are looking for someone to run the Twitter revamping.... perhaps as some kind of CXO under you... Emil Michael is a friend that just offered that idea. Genevieve loved working for him at Klout. He went on to become Chief Business Officer of Uber for 2013-17.	Steve Jurvetson ([REDACTED])	Steve Jurvetson ([REDACTED]), Self ([REDACTED])
2022-04-29 19:22:37 (CDT)	I don't have a LinkedIn account	Self ([REDACTED])	Steve Jurvetson ([REDACTED]), Self ([REDACTED])

2022-04-29 19:24:54 (CDT)	I don't think we will have any CXO titles	Self ([REDACTED])	Steve Jurvetson ([REDACTED]), Self ([REDACTED])
2022-04-29 19:43:51 (CDT)	OK. Are you looking to hire anyone, or do you plan to run it?	Steve Jurvetson ([REDACTED])	Steve Jurvetson ([REDACTED]), Self ([REDACTED])
2022-04-29 19:51:03 (CDT)	<Attachment - image/jpeg - Screen Shot 2022-04-29 at 5.49.53 PM.jpeg>	Steve Jurvetson ([REDACTED])	Steve Jurvetson ([REDACTED]), Self ([REDACTED])
2022-04-29 19:51:03 (CDT)	This is his experience prior to Uber:	Steve Jurvetson ([REDACTED])	Steve Jurvetson ([REDACTED]), Self ([REDACTED])
2022-04-29 19:52:22 (CDT)	Please send me anyone who actually writes good software	Self ([REDACTED])	Steve Jurvetson ([REDACTED]), Self ([REDACTED])
2022-04-29 19:56:57 (CDT)	Ok, no management; good coders, got it.	Steve Jurvetson ([REDACTED])	Steve Jurvetson ([REDACTED]), Self ([REDACTED])
2022-04-29 20:02:20 (CDT)	Yes	Self ([REDACTED])	Steve Jurvetson ([REDACTED]), Self ([REDACTED])
2022-04-29 20:02:33 (CDT)	Twitter is a software company (or should be)	Self ([REDACTED])	Steve Jurvetson ([REDACTED]), Self ([REDACTED])
2022-04-29 20:09:56 (CDT)	Yes. My son at Reddit and some other young people come to mind. I was thinking about who is going to manage the software people (to prioritize and hit deadlines), and I guess that's you.	Steve Jurvetson ([REDACTED])	Steve Jurvetson ([REDACTED]), Self ([REDACTED])
2022-04-29 20:37:01 (CDT)	I will oversee software development	Self ([REDACTED])	Steve Jurvetson ([REDACTED]), Self ([REDACTED])

Exhibit I

From: David Mader
Sent: Tuesday, August 23, 2022 1:15 PM
To: Wilson, Bradley R.
Cc: Silpa Maruri; Emily Kapur; Andrew J. Rossman; Alex Spiro; Christopher Kercher; Matthew Fox; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP); Kathryn Bonacorsi; Shannon, Kevin R. (Potter Anderson & Corroon LLP); Kelly, Christopher N. (Potter Anderson & Corroon LLP); Kirk, David E.; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC); Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC); Savitt, William D.; Eddy, Sarah K.; McLeod, Ryan A.; Reddy, Anitha; Yavitz, Noah B.; Goodman, Adam L.; Sadinsky, Alexandra P.; Jaclyn Palmerson
Subject: RE: Twitter v. Musk

Counsel, without agreeing to your assertions regarding the relevance of the topic you identify, we confirm that we will include in the review population documents matching the terms you identify for the time period you identify.

Regards,

David

David Mader

Partner

Quinn Emanuel Urquhart & Sullivan LLP.
51 Madison Avenue, 22nd Floor
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212.849.7148 Direct
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From: Wilson, Bradley R. <BRWilson@wlrk.com>
Sent: Monday, August 22, 2022 5:08 PM
To: David Mader <davidmader@quinnemanuel.com>
Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Andrew J. Rossman <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Christopher Kercher <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Kathryn Bonacorsi <kathrynbacorsi@quinnemanuel.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Kirk, David E. <DEKirk@wlrk.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SKEddy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBVavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>; Jaclyn Palmerson

<jaclynpalmerson@quinnemanuel.com>

Subject: RE: Twitter v. Musk

[EXTERNAL EMAIL from brwilson@wlrk.com]

Counsel,

Text messages between Mr. Musk and Morgan Stanley personnel, produced recently by Morgan Stanley, make plain the relevance of the geopolitical situation in the Ukraine to this case. See MSCO-0088078, -0088102-03, -0088207, -0088241. To ensure that defendants identify and produce these and similarly relevant documents, we propose the following additional search terms, to be run against Mr. Musk and Mr. Birchall's accounts for the period from April 25, 2022 through July 8, 2022:

- Vlad* OR Putin OR Ukraine OR Russia* OR WW3

Please confirm that defendants will include documents matching these terms in the review population.

Regards,
Brad

From: David Mader <davidmader@quinnemanuel.com>

Sent: Friday, August 19, 2022 10:41 AM

To: Wilson, Bradley R. <BRWilson@wlrk.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Rossman, Andrew J. (Quinn Emanuel Urquhart & Sullivan LLP) <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Kercher, Christopher D. (Quinn Emanuel Urquhart & Sullivan LLP) <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Kathryn Bonacorsi <kathrynbonacorsi@quinnemanuel.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Kirk, David E. <DEKirk@wlrk.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SEddy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBVavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>; Jaclyn Palmerson <jaclynpalmerson@quinnemanuel.com>

Subject: RE: Twitter v. Musk

*** EXTERNAL EMAIL ***

Counsel,

I confirm that Defendants will be running all of the search terms Plaintiff proposed on August 13 with the exception of the term [REDACTED] listed at #124 because, as discussed yesterday, that term returns every e-mail in Mr. Musk's SpaceX email account. We understand based on our conversation yesterday that Plaintiff is not insisting on application of this term.

I also confirm that Defendants will run the additional terms listed in your 9:03pm e-mail for the time period you have requested.

Regards,

David

David Mader

Partner

Quinn Emanuel Urquhart & Sullivan LLP.

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From: Wilson, Bradley R. <BRWilson@wlrk.com>

Sent: Thursday, August 18, 2022 9:03 PM

To: David Mader <davidmader@quinnemanuel.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Andrew J. Rossman <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Christopher Kercher <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Kathryn Bonacorsi <kathrynbonacorsi@quinnemanuel.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Kirk, David E. <DEKirk@wlrk.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SKeddy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBVavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>; Jaclyn Palmerson <jaclynpalmerson@quinnemanuel.com>

Subject: RE: Twitter v. Musk

[EXTERNAL EMAIL from brwilson@wlrk.com]

Counsel,

Thank you for confirming. To be clear, will defendants also be running all of the search terms we proposed on August 13 on Mr. Musk's SpaceX email account?

In addition, as we previewed on the call, in light of defendants' disclosure in the papers they filed with the Court last night that defendants engaged Guidepost Solutions as an additional data scientist, we request that defendants also review documents from January 1, 2022 through July 8, 2022 matching the following terms:

- (Andrew and O'Connell)
- guidepostsolutions.com

Please confirm that defendants will agree to add these search terms.

Regards,
Brad

From: David Mader <davidmader@quinnemanuel.com>

Sent: Thursday, August 18, 2022 8:49 PM

To: Wilson, Bradley R. <BRWilson@wlrk.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Rossman, Andrew J. (Quinn Emanuel Urquhart & Sullivan LLP) <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Kercher, Christopher D. (Quinn Emanuel Urquhart & Sullivan LLP) <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Kathryn Bonacorsi <kathrynbonacorsi@quinnemanuel.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Kirk, David E. <DEKirk@wlrk.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SKeddy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBVavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>; Jaclyn Palmerson <jaclynpalmerson@quinnemanuel.com>

Subject: RE: Twitter v. Musk

*** EXTERNAL EMAIL ***

Counsel,

Further to my Tuesday e-mail, and further to our discussion earlier this evening, I am attaching two hit reports reflecting the hit counts for Plaintiff's most recent set of proposed search terms. We confirm that Defendants will review all documents that hit on these proposed search terms.

Regards,

David

David Mader

Partner

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review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.

From: David Mader

Sent: Tuesday, August 16, 2022 12:26 PM

To: Wilson, Bradley R. <BRWilson@wlrk.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Andrew J. Rossman <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Christopher Kercher <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Kathryn Bonacorsi <kathrynbonacorsi@quinnemanuel.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Kirk, David E. <DEKirk@wlrk.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SKeddy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBVavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>; Jaclyn Palmerson <jaclynpalmerson@quinnemanuel.com>

Subject: RE: Twitter v. Musk

Counsel,

We write to address your email below, as well as some additional points.

On your first point, we confirm that QE is making responsiveness determinations for documents collected from SpaceX.

On your second point, we are still in the process of generating new hit reports. As you know, Twitter has included as “search terms” – numerous times and in numerous iterations – various *requests* seeking specific information from Defendants, such as search term 105 in your latest proposal. This “search term” asks us to apply, as a search term, “any email address that Defendants used to communicate with any of Jason Calacanis, Chamath Palihapitiya, Steve Jurvetson, Joe Lonsdale, Igor Kurganov, Kimbal Musk, Larry Ellison, Ken Griffin, Prince Al Waleed bin Talal Al Saud, David Sacks, Reid Hoffman, Sam Altman, Sam Teller, Andrej Karpathy, Marc Andreessen, Ben Horowitz, Changpeng Zhao, Joe Gebbia, Kaiser Ng, Ron Baron, Sam Bankman-Fried.” This request is objectionable on its face, representing just the latest example of Twitter’s abusive campaign to harass Mr. Musk and his acquaintances in an obvious fishing expedition. Twitter has already subpoenaed many of the individuals referenced in its “search term” 105, and it continues to subpoena new individuals and entities each day. Defendants consider Twitter’s conduct to be an abuse of the discovery process, and we reserve the right to raise Twitter’s conduct with the Court in due course. Nevertheless, we are working to address and complete your request—a significantly time consuming process given that you have asked about correspondence with more than twenty individuals. We expect to have updated hit reports by tonight.

With respect to Twitter’s collection and production efforts, we expect to provide our proposed messaging protocol for Twitter later today, following receipt of the Court’s order regarding custodians yesterday. We trust that you have conducted custodial interviews of all the 42 individuals referenced in the Court’s order to determine who possesses messages (including text, Slack, and WhatsApp) related to the matters in dispute, and that you have collected all potentially responsive messages for review. We would like to meet and confer tomorrow to discuss these efforts and to identify which Twitter custodians have potentially responsive messages.

Relatedly, Twitter has failed to provide the updated hit report we requested days ago, on August 12, and that we followed up on during Sunday’s meet and confer. Please provide an updated hit report by the close of business today or explain why it has not been provided. During Sunday’s meet and confer we also asked about Twitter’s productions, given your statement during our August 11 meet and confer that Twitter would be making a “significant” production on

August 12. During our Sunday call you explained that your vendor had been experiencing technical difficulties on Friday and over the weekend that had hindered production. We observe that you have nevertheless made *eight* third party productions through your vendor since Friday, including, notably, *five* after we asked you to produce all third party productions in Twitter's possession immediately. As we still have yet to receive the "significant" production promised last Thursday, we are increasingly concerned that Twitter is engaging in tactical delay even as it files motions accusing Defendants, falsely, of doing the same.

Regards,

David

David Mader

Partner

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From: Wilson, Bradley R. <BRWilson@wlrk.com>

Sent: Tuesday, August 16, 2022 12:47 AM

To: David Mader <davidmader@quinnemanuel.com>; Kathryn Bonacorsi <kathrynbonacorsi@quinnemanuel.com>; Kirk, David E. <DEKirk@wlrk.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Andrew J. Rossman <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Christopher Kercher <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SKEDdy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NB_Yavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>; Jaclyn Palmerson <jaclynpalmerson@quinnemanuel.com>

Subject: RE: Twitter v. Musk

[EXTERNAL EMAIL from brwilson@wlrk.com]

Counsel,

We have received no response from defendants regarding two important points in the email below, which we sent on Saturday, August 13.

First, we asked you on Saturday to clarify the statement in your email from earlier that day that SpaceX will “provide all responsive documents to [Quinn Emanuel] for attorney review.” To reiterate our question: Who is making the responsiveness determination referenced in that statement? Given that we have been pressing for information about your collection of Mr. Musk’s SpaceX email account for some time, we must insist that you answer this question very promptly today (August 16).

Second, we sent you on Saturday an updated list of proposed search terms for defendants’ review that takes account of new information provided in defendants’ supplemental interrogatory responses and other information that Twitter has recently learned in discovery. If we do not receive a substantive response from you regarding this proposal—accompanied by a full hit report—by the close of business today (August 16), we will conclude that defendants have agreed to apply all of the proposed search terms.

Regards,
Brad

From: Wilson, Bradley R.

Sent: Saturday, August 13, 2022 10:00 PM

To: 'David Mader' <davidmader@quinnemanuel.com>; Kathryn Bonacorsi <kathrynbbonacorsi@quinnemanuel.com>; Kirk, David E. <DEKirk@wlrk.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Rossman, Andrew J. (Quinn Emanuel Urquhart & Sullivan LLP) <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Kercher, Christopher D. (Quinn Emanuel Urquhart & Sullivan LLP) <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slight, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SEddy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBAYavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>; Jaclyn Palmerson <jaclynpalmerson@quinnemanuel.com>

Subject: RE: Twitter v. Musk

Counsel,

We write in response to your email from this morning:

- Co-Investors / RFP No. 6. We are in agreement that we are at impasse on this issue.
- RFP No. 18. We understand that defendants have withdrawn their relevance objection to RFP No. 18. If our understanding is not correct, please let us know immediately.

Instead, we understand from your email that defendants are taking the position that documents responsive to this request that “concern[] government investigations” cannot be produced because they are subject to a “governmental privilege.” There is no such privilege that defendants can invoke for documents in their possession. We have carefully reviewed the authorities you cited in your email, and they are inapposite. As you must know, private parties commonly produce the kinds of communications that RFP No. 18 targets. Defendants should withdraw their meritless assertion of “governmental privilege” and agree to produce all of their communications

with federal, state, and local governmental authorities concerning the topics listed in RFP No. 18. Please let us know by tomorrow whether defendants will do so.

- RFP Nos. 2, 6, 7, 9, 10, 16, 20, 21, 23, 24, 27, and 28. We understand from your email that defendants intend to withhold documents responsive to certain of these requests—your email does not identify which ones—to the extent that otherwise responsive documents contain “information that may be the subject of expert testimony.” This is not acceptable, as it leaves Twitter no way of knowing what categories of documents defendants intend to withhold on the basis of this objection. This dispute is ripe for judicial review under Paragraph 14 of the Scheduling Order.
- Deficient Interrogatory responses. Your email complains that Twitter has not identified specific deficiencies in defendants’ supplemental interrogatory responses. That is not accurate. On August 5, we identified deficiencies in defendants’ response to Interrogatory No. 3. We elaborated on that deficiency in a letter sent on August 8. And in a separate letter sent on August 8, we itemized additional deficiencies in defendants’ responses to Interrogatory Nos. 1, 2, 12, 16, and 17, among others.

Defendants waited until the afternoon of Friday, August 12—*after* the deadline for the service of final RFPs and interrogatories—to supplement their deficient interrogatory responses. The service of these supplemental responses was apparently timed to prevent Twitter from serving additional written discovery based on the additional information that defendants were providing. Twitter reserves all rights in that regard. That aside, the supplemental responses do not cure the deficiencies that Twitter has previously identified. For example:

(i) Defendants’ supplemental response to Interrogatory No. 12 does not identify Steve Jurvetson, Jason Calacanis, or David Sacks as individuals with whom Mr. Musk communicated about the Merger, despite the fact that defendants admitted in their response to Interrogatory No. 21—which directly asked about those specific individuals—that Mr. Musk communicated about the Merger with each of them during the relevant time period. It is therefore evident that defendants are refusing to provide information called for by Interrogatory No. 12 by withholding the identities of individuals with relevant information, on the basis of some limiting construction with respect to that interrogatory that defendants have not disclosed. This is not acceptable.

(ii) Defendants’ supplemental response to Interrogatory No. 3 makes clear that defendants are still withholding the identity of data scientists on the basis of unfounded privilege, work product, and “expert testimony” objections. This is not acceptable.

Twitter was entitled to full and complete responses to its first and second sets of interrogatories by no later than August 5. Defendants cannot continue to delay foundational discovery in this expedited litigation through piecemeal and incomplete responses. We intend to seek judicial relief to ensure that defendants timely provide the information they are withholding.

- 30(b)(6) Depositions. We are prepared to meet and confer about defendants’ 30(b)(6) deposition notices tomorrow. However, as we have set out in the prior correspondence, we believe that defendants’ demand for immediate 30(b)(6) depositions that will require Twitter witnesses to sit for multiple depositions—starting before the substantial completion of document productions—is inconsistent with the Scheduling Order and Delaware practice.

- SpaceX documents. We are considering the additional information you have provided about SpaceX. In the meantime, please clarify your statement that SpaceX will “provide all responsive documents to us for attorney review.” Who is making the responsiveness determination referenced in that statement? Given that the email address in question belongs to the principal defendant in this case, if the answer is not attorneys for defendants, we will likely have a dispute on this issue.

Lastly, based on the limited information provided in defendants’ supplemental interrogatory responses, and other information that Twitter has recently learned in discovery, Twitter has revised its email search proposal to include several additional search terms. That revised proposal is attached. Please confirm that defendants will review for production any documents from Mr. Musk or Mr. Birchall’s email accounts that contain these terms.

Regards,
Brad

From: David Mader <davidmader@quinnemanuel.com>
Sent: Saturday, August 13, 2022 11:13 AM
To: Wilson, Bradley R. <BRWilson@wlrk.com>; Kathryn Bonacorsi <kathrynbonacorsi@quinnemanuel.com>; Kirk, David E. <DEKirk@wlrk.com>
Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Rossman, Andrew J. (Quinn Emanuel Urquhart & Sullivan LLP) <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Kercher, Christopher D. (Quinn Emanuel Urquhart & Sullivan LLP) <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slights, Joseph (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SKEDdy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBAYavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>; Jaclyn Palmerson <jaclynpalmerson@quinnemanuel.com>
Subject: RE: Twitter v. Musk

*** EXTERNAL EMAIL ***

Counsel,

I write in further response to your e-mail of 6:42pm yesterday.

- We agree that the parties are at an impasse with regard to the term “Co-Investors” as a defined term and in the context of RFP No. 6. Regarding Defendants’ objections to requests seeking information that may be the subject of expert testimony, we have explained that Defendants will produce, withhold, and/or log documents consistent with their obligations under the applicable rules, including Rule 26. We understand that Plaintiff has voiced its dissatisfaction with Defendants’ invocation of those rules, and although we do not understand the basis of Plaintiff’s position, we agree that the parties have exhausted the meet-and-confer process on this issue.

- With regard to Regarding RFP No. 18, Defendants will agree to produce communications with governmental entities regarding the topics listed in RFP No. 18, except for documents concerning government investigations. Such documents are subject to a governmental privilege that Defendants are not in a position to waive. For example, insofar as RFP No. 18 calls for documents that may relate to investigations by the U.S. Securities and Exchange Commission, any such investigation and related documents would be non-public and confidential. *See, e.g.*, 5 U.S.C. §§ 552(b)(4), (b)(7)(A) & (B), (b)(7)(C), (b)(8) (protecting against disclosure of confidential non-public investigative file during pendency investigation); 17 C.F.R. § 203.5 (“Unless otherwise ordered by the Commission, all formal investigative proceedings shall be non-public.”); 17 C.F.R. § 203.2 (“Information or documents obtained by the Commission in the course of any investigation or examination, unless made a matter of public record, shall be deemed non-public.”). As we explained during our call on Thursday, the privilege reflected in these restrictions belongs to the agency. *LaMorte v. Mansfield*, 438 F.2d 448, 451 (2d Cir. 1971); *see also Zients v. LaMorte*, 319 F. Supp. 956, 958 (S.D.N.Y. 1970) (“[I]t is left to the administrative agency, the SEC, to determine whether the cloak of confidentiality is essential to the conduct of a particular investigation being conducted by it or whether public disclosure of the contents of documents and testimony would not be contrary to the public interest.”). Documents concerning government investigations may also be subject to a law enforcement privilege and/or deliberative process privilege. *See, e.g., In re Sealed Case*, 856 F.2d 268, 272 (D.C. Cir. 1988) (law enforcement privilege); *In re Sealed Case*, 121 F.3d 729, 737 (D.C. Cir. 1997) (deliberative process privilege). To the extent Defendants may possess documents otherwise responsive to RFP No. 18 that relate to government investigations and are accordingly subject to such privileges, Defendants are not in a position to waive those privileges on behalf of the governmental entity to which they belong.
- With regard to RFP Nos. 2, 7, 9, 10, 16, 20, 21, 23, 24, 27, and 28, Defendants confirm that they will produce non-privileged documents responsive to these requests that can be located pursuant to the Search Protocol (with the exception of RFP No. 28, for which Defendants agreed to produce documents “sufficient to show,” as to one subpart, as requested, and otherwise agreed to produce non-privileged documents responsive to RFP No. 28 that can be located pursuant to the Search Protocol). Defendants’ agreement to produce such documents is subject to Defendants’ objections on the basis of attorney work product and attorney-client privilege (as reflected in Defendants’ responses and objections) and Defendants’ objections on the basis that a request is seeking information that may be the subject of expert testimony, as clarified in Defendants’ August 10 letter and during our call on Thursday.
- Plaintiff’s unilateral declaration that the parties are at an impasse with regard to Defendants’ supplemental interrogatory responses is entirely inappropriate and contrary to the text and spirit of the Court’s scheduling order. Plaintiff does not identify which specific interrogatory responses it finds “deficient.” Nor does Plaintiff provide any explanation as to how such responses are deficient, which, of course, is a prerequisite to Defendants being able to cure any alleged deficiency. As Defendants represented on the parties’ meet and confer on Thursday night, Defendants supplemented their interrogatory responses in good faith, and intended to provide complete responses (and did so as promptly as possible, contrary to Plaintiff’s unsupported contentions to the contrary). To the extent Plaintiff believes these responses are deficient, please immediately identify the specific deficiencies so that Defendant have an opportunity to cure. Until Plaintiff specifically identifies these purported deficiencies, Defendants disagree that the parties are at an impasse and maintain that a rush to court for resolution is premature under the scheduling order and therefore improper.

- Regarding Defendants' 30(b)(6) notices, Defendants disagree with Plaintiff's contention that Defendants' request for these 30(b)(6) notices is not reasonable, efficient, or consistent with the Scheduling Order. There is nothing that precludes these depositions from proceeding on the timeline Defendants have requested. Defendants are simply trying to work with the expedited scheduled Plaintiff requested. We are available to meet and confer tomorrow morning between 9:30am and 11:30am ET. Please be prepared to identify the relevant witnesses for these depositions and provide dates next week when these depositions can go forward. Given the importance of these depositions and Defendants' refusal, to date, to provide the requested discovery, Defendants are prepared to seek immediate relief from the Court.
- Defendants look forward to receiving Plaintiff's response to Defendants' questions regarding Twitter's data.

With respect to Plaintiff's requested discovery from SpaceX, the collection and review of documents implicates significant security concerns given the nature of SpaceX's business. SpaceX has possession of documents of varying degrees of confidentiality with attendant restrictions, as does Mr. Musk. After speaking with SpaceX and its security team, we can confirm that government *classified* information is maintained on separate networks. However, controlled unclassified information ("CUI") is *not* kept on separate networks and is in Mr. Musk's SpaceX email account. CUI, like classified information, can be designated by the government and requires various types of safeguarding and controls, the degree of which varies depending on the type of CUI at issue. Among other things, access to CUI may require individual vetting and execution of an NDA. SpaceX is legally obligated, on threat of civil and potentially criminal penalties, to enforce these restrictions, and it must maintain the necessary precautions to avoid improper disclosure. In light of these requirements, SpaceX has determined that it cannot export Mr. Musk's entire SpaceX email account consistent with its legal obligations. Instead, SpaceX will apply Twitter's requested search terms for the date range you have requested within SpaceX's IT infrastructure, and will provide all responsive documents to us for attorney review prior to production. We are working with SpaceX to prepare a hit report.

As noted in our e-mail of 7:09pm yesterday, Plaintiff has yet to provide a substantive response to any of the issues raised on our meet and confer Thursday night with regard to Plaintiff's own discovery responses. We expect Plaintiff to address these issues promptly.

Regards,

David

David Mader

Partner

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From: David Mader

Sent: Friday, August 12, 2022 7:09 PM

To: Wilson, Bradley R. <BRWilson@wlrk.com>; Kathryn Bonacorsi <kathrynbonacorsi@quinnemanuel.com>; Kirk, David E. <DEKirk@wlrk.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Andrew J. Rossman <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Christopher Kercher <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SKEDdy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBAYavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>; Jaclyn Palmerson <jaclynpalmerson@quinnemanuel.com>

Subject: RE: Twitter v. Musk

Counsel,

We are in receipt of your e-mail of 6:42pm today and will respond in due course. We note, however, that Plaintiff neither responded to our request to reschedule a meet and confer this afternoon, nor has provided a substantive response to any of the issues raised during our meet-and-confer call yesterday with respect to Defendants' own discovery responses. Defendants' delay in providing those responses, either in writing or during a meet-and-confer this afternoon, is prejudicial to Defendants.

In particular, we await your position regarding Plaintiff's willingness to withdraw, in whole or part, its relevance objections to Defendants' document requests relating to mDAU and other metrics. During our call, you indicated that Plaintiff's objections to those requests included objections based on anticipated burden. We note, however, that you have not substantiated any such burden objection. Moreover, as we explained, Defendants' position is that any such burden objection is appropriately addressed through the application of an appropriate set of search terms. To that end, we attach hereto a proposed set of search terms designed to identify documents responsive to Defendants' mDAU/other metric-related requests.

In order to assess Plaintiff's burden objection, and to facilitate a productive discussion on this topic at our next meet-and-confer, we ask that you apply these search terms to the custodial files of all of the custodians Defendants have requested in their pending Motion to Compel, including both the agreed-upon custodians proposed by Plaintiff and Defendants' additional requested custodians, and provide us with a hit report by tomorrow.

Regards,

David

David Mader

Partner

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From: Wilson, Bradley R. <BRWilson@wlrk.com>

Sent: Friday, August 12, 2022 6:42 PM

To: David Mader <davidmader@quinnemanuel.com>; Kathryn Bonacorsi <kathrynbonacorsi@quinnemanuel.com>; Kirk, David E. <DEKirk@wlrk.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Andrew J. Rossman <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Christopher Kercher <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SKEDdy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBVavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>; Jaclyn Palmerson <jaclynpalmerson@quinnemanuel.com>

Subject: RE: Twitter v. Musk

[EXTERNAL EMAIL from brwilson@wlrk.com]

Counsel,

We write in response to the various emails you have sent today:

- We understand from your 12:37 p.m. email that we have reached an impasse on (1) the definition of co-investors (and defendants' related proposed limitation of their search for documents responsive to RFP 6); and (2) defendants' repeated objection to Twitter's RFPs as seeking "information that may be the subject of expert testimony," as well as defendants' related refusal to commit to logging such information, at a minimum. We further understand that, absent a change in defendants' position, we are likewise at an impasse with regard to RFP 18, which seeks communications with the SEC, the Texas AG, and other governmental officials or agencies. Please let us know by tomorrow if defendants have changed their position on RFP 18.
- You also stated in your 12:37 p.m. email that you agree with our summary of the parties' resolution on yesterday's meet-and-confer as to RFP 22. What is not entirely clear from your email is defendants' position with respect to certain other RFPs we discussed on our call yesterday evening.
 - We set forth in paragraph (4) of the email we sent at 2:16 a.m. our understanding of the agreement we reached on the meet-and-confer as to the scope of production from defendants in response to a number of Twitter's

RFPs to which defendants had previously objected—namely, RFPs 2, 7, 9, 10, 16, 20, 21, 23, 24, 27, and 28. Your 12:37 p.m. email did not express disagreement with our description of what defendants have agreed to produce in response to those RFPs. In fact, your email acknowledged that “the parties have resolved their outstanding issues with respect to these document requests.” But your email also stated in the very first sentence that defendants “do not agree with [Twitter’s] summary and characterization of our discussion in all respects.” Given the importance of these RFPs, we do not want there to be any misunderstanding: If defendants disagree, in any respect, with our characterization of what defendants have agreed to produce in response to RFPs 2, 7, 9, 10, 16, 20, 21, 23, 24, 27, or 28, as described our 2:16 a.m. email, please let us know right away, and by no later than tomorrow.

- We are in receipt of defendants’ supplemental interrogatory responses, which you belatedly sent us at 1:18 p.m. Those supplemental responses are deficient in multiple respects. Given the amount of time defendants took to serve their supplemental responses, and defendants’ failure to sufficiently address the concerns we had identified, we do not believe that further discussion about these interrogatories would be productive. Nor does the expedited schedule afford us further time to continue chasing defendants for complete responses. We are at an impasse.
- We are in receipt of your email from 9:36 a.m. regarding defendants’ 30(b)(6) deposition notices. As we have told you, Twitter is serving responses and objections to those notices this evening, and we will make ourselves available over the weekend for the meet-and-confer you have requested. Per our prior correspondence, Twitter does not believe that defendants’ demand for 30(b)(6) depositions as soon as next week is reasonable, efficient, or consistent with the Scheduling Order or Delaware practice in expedited cases.
- We are in receipt of your email from 1:50 p.m. posing certain questions about Twitter’s stored data. We will endeavor to provide a good-faith response to your questions, and we expect to do so tomorrow.

When we next meet and confer, we intend to follow up on your collection of emails from Mr. Musk’s SpaceX account and address the hit reports you sent us last night for Mr. Musk’s Tesla account and Mr. Birchall’s Excession account. We can also update you at that time on our thinking about the appropriate search terms for Twitter’s email and Google docs review. We also expect to have certain clarifying questions about the discovery responses that defendants served last night.

Regards,
Brad

From: David Mader <davidmader@quinnemanuel.com>

Sent: Friday, August 12, 2022 1:50 PM

To: Wilson, Bradley R. <BRWilson@wlrk.com>; Kathryn Bonacorsi <kathrynbonacorsi@quinnemanuel.com>; Kirk, David E. <DEKirk@wlrk.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Rossman, Andrew J. (Quinn Emanuel Urquhart & Sullivan LLP) <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Kercher, Christopher D. (Quinn Emanuel Urquhart & Sullivan LLP) <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SKeddy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBYavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>; Jaclyn Palmerson <jaclynpalmerson@quinnemanuel.com>

Subject: RE: Twitter v. Musk

*** EXTERNAL EMAIL ***

Counsel,

Further to yesterday's meet and confer and the parties' prior written correspondence, we are following up regarding Defendants' Requests for Production numbers 2-4 and 18-19, which seek production of:

- (1) Historical data for the "Twitter Firehose", "Compliance Firehose API", "Follow, Search, and Get Users API", and "Account Activity API" (RFP 2);
- (2) Data sufficient to identify IP address, geolocation, creation date, accessing device information, volume of direct messages, and session timestamps for each account in mDAU (RFP 3);
- (3) Certain specific data items transmitted by an account browsing Twitter to Twitter's logging APIs for each account in mDAU (RFP 4);
- (4) Certain specific data items for each sampled account in the mDAU audit (RFP 18); and
- (5) The "Private" data provided to Twitter's human labelers for each sampled account in the mDAU audit (RFP 19),

Your letters of August 9 and 10 indicated that Twitter does not have at least some of this requested data stored, or stored in a particular format.

During yesterday's meet-and-confer discussion, you indicated that Plaintiff was willing to provide additional information regarding what data Twitter does store, what data Twitter may have stored at some time in the past, and what data Twitter does not and has never stored, and you invited us to send specific questions on this topic. Accordingly, for each item above, please promptly confirm:

- (1) What requested data Twitter currently stores and has access to;
- (2) What requested data Twitter stored in the past, but no longer stores or has access to;
- (3) For data that was previously stored but is no longer accessible, when that data ceased to be stored and/or accessible, and the reasons it is no longer stored and/or accessible;
- (4) For data that was previously stored but is no longer accessible, whether Twitter stores and has access to the same categories of data regarding timeframes other than those called for in Defendants' discovery requests, such as for the second fiscal quarter of 2022; and

(5) What requested data Twitter has never stored.

In addition, you agreed during our call to identify the “private data” that is or was provided to human reviewers as part of the mDAU audit process. Specifically, you indicated that the “private data” included but was not limited to IP address, geolocation, and certain information regarding other Twitter platform activity by an account under review, and you indicated that additional pieces of information may also be included among the “private data” used in the mDAU audit process. Please promptly identify all of the “private” data that is provided to human reviewers, and please address each of the five questions listed immediately preceding this paragraph with respect to each element of that “private data.”

Finally, for requests where Defendants have requested data *sufficient to identify* certain information (RFPs 3-4, 18), and further to our discussion yesterday, please confirm whether Twitter possesses data responsive to Defendants’ requests in any form, even if a particular source of data contains data responsive to part but not all of the scope of a given request.

Regards,

David

David Mader

Partner

Quinn Emanuel Urquhart & Sullivan LLP.

51 Madison Avenue, 22nd Floor

New York, NY 10010

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From: David Mader

Sent: Friday, August 12, 2022 1:17 PM

To: 'Wilson, Bradley R.' <BRWilson@wlrk.com>; Kathryn Bonacorsi <kathrynbonacorsi@quinnemanuel.com>; 'Kirk, David E.' <DEKirk@wlrk.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Andrew J. Rossman <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Christopher Kercher <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; 'Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP)' <edward.micheletti@skadden.com>; 'Rosenello, Lauren N' <Lauren.Rosenello@skadden.com>; 'Shannon, Kevin R. (Potter Anderson & Corroon LLP)' <kshannon@potteranderson.com>; 'Kelly, Christopher N. (Potter Anderson & Corroon LLP)' <ckelly@potteranderson.com>; 'Slight, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC)' <jslight@wsgr.com>; 'Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC)' <bsorrels@wsgr.com>; 'Savitt, William D.' <wdsavitt@WLRK.com>; 'Eddy, Sarah K.' <SKeddy@wlrk.com>; 'McLeod, Ryan A.' <RAMcLeod@wlrk.com>; 'Reddy, Anitha' <AReddy@wlrk.com>; 'Yavitz, Noah B.' <NBYavitz@wlrk.com>; 'Goodman, Adam L.' <ALGoodman@wlrk.com>; 'Sadinsky, Alexandra P.' <APSadinsky@wlrk.com>; Jaclyn Palmerson <jaclynpalmerson@quinnemanuel.com>

Subject: RE: Twitter v. Musk

Counsel,

Further to my e-mail below, I am attaching copies of Defendants' Supplemental Objections and Responses to Plaintiff's First and Second Set of Interrogatories, which are separately being served in accordance with applicable rules of procedure. 11

Regards,

David

David Mader

Partner

Quinn Emanuel Urquhart & Sullivan LLP.

51 Madison Avenue, 22nd Floor

New York, NY 10010

646.241.8334 Cell

212.849.7148 Direct

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From: David Mader

Sent: Friday, August 12, 2022 12:37 PM

To: Wilson, Bradley R. <BRWilson@wlrk.com>; Kathryn Bonacorsi <kathrynbonacorsi@quinnemanuel.com>; Kirk, David E. <DEKirk@wlrk.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Andrew J. Rossman <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Christopher Kercher <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slight, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SKEDdy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBVavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>

Subject: RE: Twitter v. Musk

Counsel,

While we do not agree with your summary and characterization of our discussion in all respects, we do not think it productive to note every disagreement; rather, we wish to focus on the following points, without conceding the accuracy of your summary in other respects:

1. Defendants' Document Collection/Production: We are continuing to discuss the collection of documents with SpaceX and will revert upon completion of those discussions. As for your questions about the X Holding entities and Excession, we confirm that Mr. Birchall and Mr. Musk are the only individuals associated with those entities who possess relevant information regarding your discovery requests. The X Holding entities do not have any other employees or officers. Other than Mr. Birchall, Excession has only administrative and security staff who do not have any relevant documents or communications. With regard to hard copy documents, we confirmed our

understanding that Defendants' custodians do not possess any responsive hard copy materials. Although that continues to be our understanding, we are again confirming with our custodians and will notify you promptly if we determine that such responsive materials exist. With respect to the pace of production, we disagree with both your summary of the parties' discussion on this topic and, in particular, any suggestion that Defendants are not complying with their obligations under the Scheduling Order. Defendants have made rolling productions and will continue to do so; we anticipate making our next production in the next day or so. We noted, and reiterate, that your complaints regarding Defendants' productions are particularly hollow given the slow pace of Plaintiff's own productions in light of the volume of material Plaintiff claims to have collected for review.

2. Supplemental Interrogatory Responses: Defendants will be serving the referenced supplemental responses imminently, and we will be available to meet and confer regarding those supplemental responses this afternoon. We confirm that Defendants are not taking the position that they do not have possession, custody, or control over materials created for them by the entities and individuals identified in response to Plaintiff's Interrogatory No. 3, although Defendants do not concede that such materials are necessarily discoverable.
3. Document Requests:
 - a. Definition of Co-Investor: Defendants proposed to include within the definition any person who expected an NDA with Defendants with respect to a potential investment in Twitter. This was a reasonable compromise, as the parties who executed NDAs would be the only parties having significant, substantive discussions with Defendants regarding a potential investment. Plaintiff rejected Defendants' proposal out of hand. Plaintiff's proposal is unworkable, as it would include even the briefest, non-substantive, social interactions with any number of people. Defendants agree that the parties have reached impasse.
 - b. Definition of Defendants' Advisors: Defendants agreed to include within the definition of Defendants' Advisors both the listed entities and the data scientists identified in response to Plaintiff's Interrogatory No. 3.
 - c. Relevant Time Period: Although Defendants disagree that a time period starting earlier than April 9, 2022 is necessary, Defendants will agree in the interest of compromise, and to avoid burdening the Court, to extend the date range for Defendants' responses to Plaintiff's requests to January 1, 2022.
 - d. RFP Nos. 2, 7, 9, 10, 16, 20, 21, 23, 24, 27, 28: Defendants agree that the parties have resolved their outstanding issues with regard to these document requests.
 - e. RFP No. 6: Defendants agreed to produce communications with potential co-investors, as broadly defined by Plaintiff, to the extent they are captured by Defendants' Search Protocol. However, Defendants object to the inclusion of potential co-investors in this document request to the extent it would require Defendants to add search terms to their Search Protocol specifically targeted to capture such communications with potential co-investors. Defendants agree the parties have reached impasse.
 - f. RFP No. 15: Without agreeing to Plaintiff's characterization of our discussion, Defendants agree that the parties are at impasse on this issue.
 - g. RFP No. 18: Defendants disagree with Plaintiff's summary of the parties' discussion on RFP No. 18. Defendants will revert regarding whether there is anything Defendants can and will agree to produce in response to this request.
 - h. RFP No. 22: Defendants agree with Plaintiff's summary.
 - i. RFP No. 30: Defendants agreed in their letter to comply with all dates in the Scheduling Order, and represented that they will not withhold responsive documents until the date of depositions. Defendants

did not agree to produce all documents that would be used at a deposition “well in advance” of the deposition, and reserve all rights to use any documents Defendants believe are relevant at any deposition.

Defendants’ Document Requests

Regarding our discussion of Defendants’ document requests and Plaintiff’s responses thereto, Plaintiff agreed to revert with its position on RFP Nos. 7, 12, 13, 17, 22, 27, 34, 37, 39, 50, 55, 59, 60, 61. Further, Plaintiff agreed to identify the other data points within “private data” that mDAU audit reviewers are looking at. Plaintiff further agreed to provide a response to a series of questions regarding Twitter’s maintenance of private data. Defendants will provide this list of questions shortly.

Regards,

David

David Mader

Partner

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From: Wilson, Bradley R. <BRWilson@wlrk.com>

Sent: Friday, August 12, 2022 12:19 PM

To: David Mader <davidmader@quinnemanuel.com>; Kathryn Bonacorsi <kathrynbonacorsi@quinnemanuel.com>; Kirk, David E. <DEKirk@wlrk.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Andrew J. Rossman <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Christopher Kercher <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slight, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SKeddy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBVavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>

Subject: RE: Twitter v. Musk

[EXTERNAL EMAIL from brwilson@wlrk.com]

Counsel,

We still have not received from defendants the supplemental interrogatory responses that you committed to provide by this morning. Nor have defendants provided any of the other additional information discussed on yesterday's meet-and-confer call regarding their positions on certain key discovery issues that are in dispute, which you also said would be forthcoming this morning. Instead, we received from defendants just moments ago additional interrogatories and document requests directed at plaintiff.

Defendants should serve their long-pending supplemental interrogatory responses, and provide the promised information about their discovery positions, immediately. Unless and until we receive those responses and that information, and have a reasonable opportunity to review those materials, the meet-and-confer we had requested for 1:00 p.m. EDT must be adjourned.

Regards,
Brad

From: Wilson, Bradley R.

Sent: Friday, August 12, 2022 2:16 AM

To: David Mader <davidmader@quinnemanuel.com>; Kathryn Bonacorsi <kathrynbonacorsi@quinnemanuel.com>; Kirk, David E. <DEKirk@wlrk.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Rossman, Andrew J. (Quinn Emanuel Urquhart & Sullivan LLP) <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Kercher, Christopher D. (Quinn Emanuel Urquhart & Sullivan LLP) <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SKeddy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBYavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>

Subject: RE: Twitter v. Musk

Counsel,

We write to summarize the parties' discussions on this evening's meet-and-confer call with regard to certain of defendants' responses and objections to plaintiff's document requests and interrogatories:

Defendants' Collection and Production Status

1. **SpaceX Email Collection:** We followed up about questions we had asked you on Tuesday about Mr. Musk's SpaceX email account. You informed us that you had spoken with the relevant security personnel at SpaceX and would provide answers to our questions by tomorrow morning.
2. **Excession and X Holdings Employees:** We asked whether there are any employees other than Jared Birchall who work at Excession. You told us that, to your knowledge, there are no other employees at Excession, but you agreed to confirm that understanding. We explained that we are attempting to determine whether there are other individuals whose documents we need to ask

about at either Excession or the X Holdings entities. You responded that you did not think so, but stated you were not sure, and again agreed to confirm and let us know.

3. **Hard Copy Documents**: We asked if you were collecting hard copy files from your custodians. You informed us that you asked them and they told you they have no relevant hard copy files. We specifically asked whether either Mr. Musk or Mr. Birchall has any calendars or notebooks, and you replied that they do not.
4. **Pace of Production**: We expressed concern about the slow pace of production from defendants notwithstanding the bilateral requirement to make rolling productions under the Scheduling Order. In particular, we noted that defendants have produced only four emails to date. You said that making intermittent productions results in additional time being spent to prepare each production. We responded that the Scheduling Order requires rolling productions nonetheless, that plaintiff was providing such productions, and that defendants need to begin making significant substantive productions immediately to avoid prejudicing Twitter. You said that defendants intend to comply with their obligation to produce responsive documents on a rolling basis but did not commit to any particular timeline for defendants' next production. Please let us know when that production is forthcoming and whether it will include a significant number of responsive Communications.

Supplemental Interrogatory Responses

1. **Timing of Supplementation**: You informed us that the supplemental answers to your interrogatory responses that you previously committed to provide would be served by tomorrow (that is, Friday) morning. You confirmed that defendants will be supplementing their answers to Interrogatory Nos. 1, 2, 3, 7, 12, and 16. We look forward to receiving those supplemental answers tomorrow morning.
2. **Interrogatory No. 3**: We asked whether your supplemental answer to this interrogatory would include a full response as to all entities and individuals called for by the interrogatory. You replied that defendants are aiming to be responsive but added that you did not want to characterize the forthcoming supplemental answer. You suggested that Twitter wait to see the supplemental answer and invited us to revisit the issue tomorrow if we find the supplemental answer unsatisfactory. You also informed us that you had not yet determined whether defendants have possession, custody, or control of the Data Scientists' documents. You committed to get back to us by tomorrow morning on that issue.

Document Requests

1. **Definition of Co-Investor**: We proposed defining a "potential Co-Investor" as anyone who was contacted by Mr. Musk or on his behalf about potentially investing in post-merger Twitter. You proposed limiting the definition to only those individuals or entities that executed an NDA, which we explained was an artificially narrow construction that would exclude people Mr. Musk or his representatives communicated with about a potential investment, simply because they did not sign an NDA. We reached an impasse on this issue.
2. **Definition of Defendants' Advisors**: You clarified that you would define Defendants' Advisors to include other advisors unknown to plaintiff, since Twitter cannot list them without knowing who they are. In response to a question from us, you noted in particular that defendants would include the Data Scientists in this definition.

3. Relevant Time Period: We indicated that Twitter is standing on its position that the general time period for defendants' collection, review, and production should begin on January 1, 2022. We explained that using that start date will provide an appropriate buffer before the point when we understand that Mr. Musk began buying shares of Twitter. You asked for additional time to reconsider defendants' position on this issue, and agreed to get back to us overnight or in the morning.
4. RFP Nos. 2, 7, 9, 10, 16, 20, 21, 23, 24, 27, 28: You agreed that, subject to privilege objections, defendants will not withhold documents responsive to these requests.
5. RFP No. 1: You agreed that defendants will withdraw their relevance objections to all of the subjects enumerated in RFP No. 1 other than the relevance objection pertaining to the April 4 Letter Agreement. As to that issue, you said that defendants will withdraw the objection if defendants ultimately agree to plaintiff's January 1, 2022 start date for the relevant time period.
6. RFP No. 6: You explained that defendants' sole remaining objection to this request relates to the aforementioned issue of "potential co-Investors." We explained that that definition should not affect responsiveness because RFP No. 6 calls for all Communications concerning any potential tender offer, regardless of whom the Communication was with. You explained that defendants are nonetheless maintaining their limited definition of potential co-investors to those who had signed an NDA—for purposes of this request and otherwise—and made clear that defendants will not search for correspondence with potential co-investors as defined by Twitter. Rather, you explained, defendants will search only for Communications with Defendants' Advisors, the Lenders, the Co-Investors, or potential co-investors as defined by defendants. You added that if defendants identify other Communications concerning a potential tender offer while performing the agreed-upon search (such as a hypothetical Communication between Mr. Musk and his neighbor about a potential tender offer), you would produce such Communications. You stated in response to a question from us that defendants are taking this position because they want to limit the scope of their search for responsive Communications. We made clear that Twitter does agree with defendants' approach, or their position on this issue. We reached an impasse.
7. RFP No. 11: You explained that defendants' final position with respect to this request will depend on whether they withdrew their objection to the January 1, 2022 start date for the relevant time period, and that otherwise, subject to privilege objections, defendants will not withhold documents responsive to this request.
8. RFP No. 13: We noted that defendants had objected on relevance grounds insofar as the request concerned a tender offer, and you said you would get back to us as to whether defendants will withdraw this objection.
9. RFP No. 15: You clarified that defendants are standing on their objection regarding "information that may be the subject of expert testimony." You made clear that for this and other requests containing that objection, information that defendants claim is subject to the expert disclosure stipulation will be provided to Twitter only to the extent required by that stipulation, and that therefore such information need not be produced or logged in fact discovery by defendants. We explained that this position is unworkable and unfair to Twitter, including because critical threshold questions—such as whether the participants in these Communications were consulting experts at all, or, even if they were, when they became consulting experts—are likely to be disputed. We cited as a further example the fact that a refusal by defendants to even log these

Communications would make it impossible for Twitter to test defendants' positions and properly present any disputes to the Court. You noted that documents subject to a work-product assertion will be logged, but confirmed when pressed that in defendants' view materials relating to consulting experts will likely not be subject to disclosure or logging. You observed that Twitter's concerns in this regard are ultimately not defendants' problem to solve and that, in your view, any problem is simply a function of what the rules permit. We reached an impasse.

10. RFP No. 18: You stated that Communications relating to SEC investigations are subject to a governmental privilege that defendants cannot waive, and that therefore defendants cannot produce such Communications even under the Confidentiality Order. We asked you to identify authority supporting the proposition that the disclosure in civil discovery of Communications related to an SEC investigation is legally prohibited. You agreed to get back to us on that point. We then asked whether, in defendants' view, Communications with the SEC outside the context of an investigation (e.g. "bedbug" letters) were likewise immune from discovery. You said you had not thought about that distinction and committed to get back to us promptly. We then asked whether potential Communications with other governmental authorities, such as the Office of the Attorney General of Texas, will be produced in response to this request, and you said you would get back to us soon.
11. RFP No. 22: You agreed to adopt the definition of "competitor" proposed in our August 8 letter. You also agreed to include the "X" entity and concept (*i.e.*, X.com) that Mr. Musk recently Tweeted about in this definition.
12. RFP No. 30: You agreed that documents would be produced well in advance of their use at a deposition or any hearing.

We agreed to revisit the open issues from the list above on a meet-and-confer call at 1:00 p.m. EDT on Friday, August 12.

We will follow up tomorrow with a summary of the second part of the call.

Regards,
Brad

From: Wilson, Bradley R.

Sent: Thursday, August 11, 2022 3:47 PM

To: David Mader <davidmader@quinnemanuel.com>; Kathryn Bonacorsi <kathrynbbonacorsi@quinnemanuel.com>; Kirk, David E. <DEKirk@wlrk.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Rossman, Andrew J. (Quinn Emanuel Urquhart & Sullivan LLP) <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Kercher, Christopher D. (Quinn Emanuel Urquhart & Sullivan LLP) <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SKEDdy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBVavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P.

<APSadinsky@wlrk.com>

Subject: RE: Twitter v. Musk

Counsel,

Thank you. We will send a dial-in for 6:00 p.m. EDT.

Regards,
Brad

From: David Mader <davidmader@quinnemanuel.com>

Sent: Thursday, August 11, 2022 3:34 PM

To: Wilson, Bradley R. <BRWilson@wlrk.com>; Kathryn Bonacorsi <kathrynbonacorsi@quinnemanuel.com>; Kirk, David E. <DEKirk@wlrk.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Rossman, Andrew J. (Quinn Emanuel Urquhart & Sullivan LLP) <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Kercher, Christopher D. (Quinn Emanuel Urquhart & Sullivan LLP) <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slight, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SKeddy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBYavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>

Subject: RE: Twitter v. Musk

*** EXTERNAL EMAIL ***

Counsel,

We can make ourselves available at 6pm ET today, or at 9am ET tomorrow morning. Please let us know which of those times works, and please circulate a dial-in for that time.

Regards,

David

David Mader

Partner

Quinn Emanuel Urquhart & Sullivan LLP.

51 Madison Avenue, 22nd Floor

New York, NY 10010

646.241.8334 Cell

212.849.7148 Direct

212.849.7100 FAX

davidmader@quinnemanuel.com

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review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.

From: Wilson, Bradley R. <BRWilson@wlrk.com>

Sent: Thursday, August 11, 2022 1:58 PM

To: David Mader <davidmader@quinnemanuel.com>; Kathryn Bonacorsi <kathrynbonacorsi@quinnemanuel.com>; Kirk, David E. <DEKirk@wlrk.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Andrew J. Rossman <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Christopher Kercher <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SKEDdy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBAYavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>

Subject: RE: Twitter v. Musk

[EXTERNAL EMAIL from brwilson@wlrk.com]

Counsel,

We do not think these issues can be further delayed. Please let us know if there are times this afternoon that defendants can make themselves available to meet and confer.

Regards,
Brad

From: David Mader <davidmader@quinnemanuel.com>

Sent: Thursday, August 11, 2022 12:04 PM

To: Wilson, Bradley R. <BRWilson@wlrk.com>; Kathryn Bonacorsi <kathrynbonacorsi@quinnemanuel.com>; Kirk, David E. <DEKirk@wlrk.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Rossman, Andrew J. (Quinn Emanuel Urquhart & Sullivan LLP) <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Kercher, Christopher D. (Quinn Emanuel Urquhart & Sullivan LLP) <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SKEDdy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBAYavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>

Subject: RE: Twitter v. Musk

*** EXTERNAL EMAIL ***

Counsel,

We are not available at 4pm ET today, but are available at 10am ET tomorrow, at which time we would intend to discuss both parties' letters of last night. Please confirm your availability at that time.

Regards,

David

David Mader

Partner

Quinn Emanuel Urquhart & Sullivan LLP.

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From: Wilson, Bradley R. <BRWilson@wlrk.com>

Sent: Thursday, August 11, 2022 11:38 AM

To: Kathryn Bonacorsi <kathrynbonacorsi@quinnemanuel.com>; David Mader <davidmader@quinnemanuel.com>; Kirk, David E. <DEKirk@wlrk.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Andrew J. Rossman <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Christopher Kercher <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Eddy, Sarah K. <SKEDdy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBYavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>

Subject: RE: Twitter v. Musk

[EXTERNAL EMAIL from brwilson@wlrk.com]

Counsel,

We have reviewed your letter and would like to schedule a prompt meet-and-confer.

Are you available at 4:00 p.m. EDT today? Please advise.

Regards,
Brad

From: Kathryn Bonacorsi <kathrynbonacorsi@quinnemanuel.com>
Sent: Wednesday, August 10, 2022 10:52 PM
To: Mader, David S. (Quinn Emanuel Urquhart & Sullivan LLP) <davidmader@quinnemanuel.com>; Kirk, David E. <DEKirk@wlrk.com>
Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Rossman, Andrew J. (Quinn Emanuel Urquhart & Sullivan LLP) <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Kercher, Christopher D. (Quinn Emanuel Urquhart & Sullivan LLP) <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Wilson, Bradley R. <BRWilson@wlrk.com>; Eddy, Sarah K. <SKEDdy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBYavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>
Subject: RE: Twitter v. Musk

*** EXTERNAL EMAIL ***

Counsel:

Following up on the below, attached please find Defendants' response to your correspondence of Monday night.

Best,
Kate

From: David Mader <davidmader@quinnemanuel.com>
Sent: Wednesday, August 10, 2022 10:50 AM
To: Kirk, David E. <DEKirk@wlrk.com>
Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Kathryn Bonacorsi <kathrynbonacorsi@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Andrew J. Rossman <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Christopher Kercher <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Wilson, Bradley R. <BRWilson@wlrk.com>; Eddy, Sarah K. <SKEDdy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBYavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>
Subject: RE: Twitter v. Musk

Counsel,

We are in receipt of your letter of Monday night regarding Defendants' discovery responses. Defendants expect to furnish a written response later today.

Regards,

David

David Mader

Partner

Quinn Emanuel Urquhart & Sullivan LLP.

51 Madison Avenue, 22nd Floor

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From: Kirk, David E. <DEKirk@wlrk.com>

Sent: Monday, August 8, 2022 11:09 PM

To: David Mader <davidmader@quinnemanuel.com>

Cc: Silpa Maruri <silpamaruri@quinnemanuel.com>; Kathryn Bonacorsi <kathrynbonacorsi@quinnemanuel.com>; Emily Kapur <emilykapur@quinnemanuel.com>; Andrew J. Rossman <andrewrossman@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Christopher Kercher <christopherkercher@quinnemanuel.com>; Matthew Fox <matthewfox@quinnemanuel.com>; Micheletti, Edward B. (Skadden, Arps, Slate, Meagher & Flom LLP) <edward.micheletti@skadden.com>; Rosenello, Lauren N <Lauren.Rosenello@skadden.com>; Shannon, Kevin R. (Potter Anderson & Corroon LLP) <kshannon@potteranderson.com>; Kelly, Christopher N. (Potter Anderson & Corroon LLP) <ckelly@potteranderson.com>; Slights, Joseph R. (Wilson Sonsini Goodrich & Rosati, PC) <jslights@wsgr.com>; Sorrels, Bradley D. (Wilson Sonsini Goodrich & Rosati, PC) <bsorrels@wsgr.com>; Savitt, William D. <wdsavitt@WLRK.com>; Wilson, Bradley R. <BRWilson@wlrk.com>; Eddy, Sarah K. <SKeddy@wlrk.com>; McLeod, Ryan A. <RAMcLeod@wlrk.com>; Reddy, Anitha <AReddy@wlrk.com>; Yavitz, Noah B. <NBYavitz@wlrk.com>; Goodman, Adam L. <ALGoodman@wlrk.com>; Sadinsky, Alexandra P. <APSadinsky@wlrk.com>

Subject: Twitter v. Musk

[EXTERNAL EMAIL from dekirk@wlrk.com]

David—

Please see the attached correspondence from Brad Wilson.

Best regards,

David

David E. Kirk

Wachtell, Lipton, Rosen & Katz

51 West 52nd Street | New York, NY 10019

+1 (212) 403-1131 (Direct) | +1 (212) 403-2131 (Fax)
DEKirk@wlrk.com | www.wlrk.com

=====
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Thank you in advance for your cooperation and assistance.
=====

Exhibit J

Date	Content	Sender	Participants
2022-04-04 12:17:09 (CDT)	Great to hang yesterday. I'd love to help think through the structure for the Doge social media idea. Let me know how I can help	Mathias Döpfner	Mathias Döpfner, Self
2022-04-11 09:23:35 (CDT)	Ok	Kimbal Musk	Kimbal Musk, Self
2022-04-11 09:58:35 (CDT)	Loved "you are the hero Gotham needs - hell f'ing yes!"	Self	Self
2022-04-14 11:07:26 (CDT)	Liked "Amazing! Not sure which plan to root for. If Plan B wins, let me know if blockchain engineers would be helpful."	Self	Self
2022-04-14 11:08:03 (CDT)	<Attachment - application/vnd.openxmlformats-officedocument.wordprocessingml.document - Twitter_Interview.docx>	Mathias Döpfner	Mathias Döpfner, Self
2022-04-14 14:45:30 (CDT)	Laughed at "Who knew a Saudi Arabian prince had so much leverage and so much to say about twitter."	Self	Self
2022-04-15 16:51:45 (CDT)	Hi Elon - it's Brian Kingston at Brookfield. There was an article today in the FT that said we (Brookfield) have "decided against providing an equity cheque" for a Twitter buyout. I just wanted to let you know that didn't come from us - we would never comment (on or off the record) about something like that, particularly when it relates to one of our partners. We appreciate all that we are doing on solar together and you allowing us to participate in the Boring Co raise this week. While I'm sure you don't believe anything you read in the FT anyway, I'm sorry if the article caused any aggravation. If there is anything we can do to be helpful, please do let me know.	Brian Kingston	Brian Kingston, Self
2022-04-20 15:56:26 (CDT)	Michael Grimes here so you have my number and know who is calling. Dialing you now	Michael Grimes	Michael Grimes, Self
2022-04-23 19:57:05 (CDT)	Liked "Michael Grimes here so you have my number and know who is calling. Dialing you now"	Self	Self
2022-04-23 20:55:03 (CDT)	https://youtube.be/D0W1v0k0ELA	Michael Grimes	Michael Grimes, Self
2022-04-23 22:05:29 (CDT)	Laughed at "https://youtu.be/D0W1v0k0ELA"	Self	Self
2022-04-23 22:10:52 (CDT)	If you have a second to chat	Michael Grimes	Michael Grimes, Self
2022-04-24 16:32:08 (CDT)	<Attachment - image/jpeg - Elon Musk and Twitter Reach Deal on Sale Live Up...jpeg>	Adeo Ressi	Adeo Ressi, Self
2022-04-25 14:55:48 (CDT)	Congrats? This will be a good thing.	Adeo Ressi	Adeo Ressi, Self
2022-04-25 14:55:48 (CDT)	I hope so :)	Self	Self
2022-04-25 14:57:36 (CDT)	You've had ideas on how to fix that company for A LONG TIME. The time is now.	Adeo Ressi	Adeo Ressi, Self
2022-04-25 14:58:55 (CDT)	I think it's exciting.	Adeo Ressi	Adeo Ressi, Self
2022-04-25 15:03:20 (CDT)	Congrats! Super important to solve the bot problem.	James Musk	James Musk, Self
2022-04-25 15:31:14 (CDT)	Perfect.	Michael Grimes	Michael Grimes, Self
2022-04-25 18:40:45 (CDT)	got it. Will forward the equity interest email to Jared and Alex that he sent in and have it in the queue in the event his interest is needed overall. Absent the blockchain piece he's focused on investing if you want his interest in Twitter and your mission but we can park him for now.	Michael Grimes	Michael Grimes, Self
2022-04-25 19:58:02 (CDT)	Agree. Was one piece of equation and I do think he would be at least 3bn if you like him and want him, maybe more. Will work with Jared and Alex to be sure it makes sense to meet - my instinct is it does because Orlando Braco also declined today in the end (not sure if political fears or what but he flaked today).	Michael Grimes	Michael Grimes, Self
2022-04-25 20:04:43 (CDT)	Thanks	Self	Self
2022-04-25 21:42:35 (CDT)	The bot problem is severe	James Musk	James Musk, Self
2022-04-25 21:42:45 (CDT)	This is Elon	Self	Self
2022-04-27 19:51:21 (CDT)	Am at my Mom's apartment, doing Twitter diligence calls	Self	Self
2022-05-01 15:17:24 (CDT)	https://twitter.com/elonmusk/status/1521158715193315338?as=10&lang=en	Jason Calacanis	Jason Calacanis, Self
2022-05-02 11:32:48 (CDT)	on thing you can do in this regard is an SPV of 250 folks capped at \$10m.. pain on the next for a large company, but one item on cap table	Jason Calacanis	Jason Calacanis, Self
2022-05-02 11:33:00 (CDT)	You do have to have someone lead/manage the SPV	Jason Calacanis	Jason Calacanis, Self
2022-05-02 11:34:53 (CDT)	Go ahead	Self	Self
2022-05-02 11:42:30 (CDT)	Liked "Go ahead"	Jason Calacanis	Jason Calacanis, Self
2022-05-02 11:43:04 (CDT)	When you're private its fairly easy to do, but I think current shareholders have to re-up	Jason Calacanis	Jason Calacanis, Self

2022-05-02 11:47:16 (CDT)	Are you sure?	Self (Jason Calacanis (Jason Calacanis (Self (
2022-05-02 11:51:13 (CDT)	I am not	Jason Calacanis (Jason Calacanis (Jason Calacanis (Self (
2022-05-02 11:51:21 (CDT)	Have never done a take private	Jason Calacanis (Jason Calacanis (Jason Calacanis (Self (
2022-05-02 11:52:09 (CDT)	Large shareholders (QPs) are likely different than non-accredited investors	Jason Calacanis (Jason Calacanis (Jason Calacanis (Self (
2022-05-04 04:06:20 (CDT)	No response from Bret; not even an interest in talking. I think it's probably best to release the debt tomorrow. This might take a while.	Self (Michael Grimes	Michael Grimes	Self (
2022-05-05 10:45:04 (CDT)	Sorry, who is sending this message?	Self (Sam BF	Sam BF	Self (
2022-05-05 11:34:06 (CDT)	In LA right now. SF tomorrow to due diligence on Twitter.	Self (James Murdoch	James Murdoch	Self (
2022-05-05 17:40:57 (CDT)	Sorry, I have to be at Twitter HQ tomorrow afternoon for due diligence.	Self (John Elkann	John Elkann	Self (
2022-05-05 19:49:46 (CDT)	Nikesh came to see me this afternoon. Just to talk Twitter and you. If you had the time he would cancel his plans tomorrow night to meet with you and come to where you are in SF or mid peninsula. Or he could fly to Austin another time of course. If you want me to send him to you after the Twitter meeting let me know and he will break his plans to do	Michael Grimes	Michael Grimes (Michael Grimes (Self (
2022-05-05 21:13:06 (CDT)	It's fine, no need to break his plans.	Self (Michael Grimes (Michael Grimes (Self (
2022-05-05 21:14:42 (CDT)	Got it	Michael Grimes (Michael Grimes (Michael Grimes (Self (
2022-05-05 21:57:06 (CDT)	Liked "Best to be low-key during transaction "	David Sacks (David Sacks (David Sacks (Self (
2022-05-08 16:31:48 (CDT)	I asked Pat and Kristina to each spend the weekend writing up their transition and diligence plan and how to approach debt rating agencies on May 16. We need one of them signed up (employment contract for 3 months) as Transition CFO of X Holdings and owning the model and diligence from financial point of view on the follow up meetings with Twitter on costs and users and engineers etc. We believe two will not work at the agencies or in front of debt investors as you have to have one CFO. If you were willing to have SVP Ops of X Holdings (Pat would be more qualified for that than Kristina) then it's possible to retain them both for the transition. The way to stay on ludicrous speed is to pick one of them tomorrow as transition CFO and then we run with it full metal jacket. I believe each can do the job and deliver the ratings and debt and transition plan for day one. Then you dismiss him/her as job well done or offer permanent CFO if you choose. You get the speed and certainty we need now but not locked into anything for future.	Michael Grimes (Michael Grimes (Michael Grimes (Self (
2022-05-08 17:53:15 (CDT)	Neither were great	Self (Michael Grimes	Michael Grimes	Self (
2022-05-08 17:53:44 (CDT)	They asked no good questions and had no good comments	Self (Michael Grimes	Michael Grimes	Self (
2022-05-08 17:54:10 (CDT)	Let's slow down just a few days	Self (Michael Grimes	Michael Grimes	Self (
2022-05-08 17:54:33 (CDT)	Putin's speech tomorrow is extremely important	Self (Michael Grimes	Michael Grimes	Self (
2022-05-08 17:55:08 (CDT)	It won't make sense to buy Twitter if we're headed into WW3	Self (Michael Grimes	Michael Grimes	Self (
2022-05-08 17:55:14 (CDT)	Just sayin	Self (Michael Grimes	Michael Grimes	Self (
2022-05-08 17:58:57 (CDT)	Understood. If the pace stays rapid each are good enough to get job done for the debt. Then you hire great for go forward. But will pause for May 9 Vladimir and hope for the best there. We can take stock of where things look after that	Michael Grimes	Michael Grimes	Michael Grimes	Self (
2022-05-08 18:10:09 (CDT)	Liked "Understood. If the pace stays rapid each are good enough to get job done for the debt. Then you hire great for go forward. But will pause for May 9 Vladimir and hope for the best there. We can take stock of where things look after that"	Self (Michael Grimes (Michael Grimes (Self (
2022-05-08 18:24:36 (CDT)	An extremely fundamental due diligence item is understanding exactly how Twitter confirms that 95% of their daily active users are both real people and not double-counted.	Self (Michael Grimes (Michael Grimes (Self (
2022-05-08 18:24:56 (CDT)	They couldn't answer that on Friday, which is insane.	Self (Michael Grimes	Michael Grimes	Self (
2022-05-08 18:27:33 (CDT)	If that number is more like 50% or lower, which is what I would guess based on my feed, then they have been fundamentally misrepresenting the value of Twitter to advertisers and investors.	Self (Michael Grimes	Michael Grimes	Self (
2022-05-08 19:36:23 (CDT)	To be super clear, this deal moves forward if it passes due diligence, but obviously not if there are massive gaping issues.	Self (Michael Grimes	Michael Grimes	Self (
2022-05-08 19:37:04 (CDT)	True user account is a showstopper if actually much lower than the 95% claimed	Self (Michael Grimes	Michael Grimes	Self (
2022-05-09 05:52:43 (CDT)	Parag said that Twitter has 2500 coders doing at least 100 lines per month. Maybe they could fit this feature in ... https://twitter.com/skylerrainij/status/1523616659365277698?s=10&t=1qmVNIhQPelHafBPehiFR	Self (Michael Grimes	Michael Grimes	Self (

2022-05-10 09:57:54 (CDT)	Connecting you.	Antonio Gracías ([REDACTED])	Antonio Gracías ([REDACTED])	Self ([REDACTED])
2022-05-10 10:22:51 (CDT)	Hi Elon This is Peter and my numbers. Look forward to being helpful Bob	[REDACTED]	[REDACTED]	Self ([REDACTED])
2022-05-10 10:23:02 (CDT)	Got it	Self ([REDACTED])	[REDACTED]	Self ([REDACTED])
2022-05-10 10:23:26 (CDT)	Should we use the above two numbers for the conf call?	Self ([REDACTED])	[REDACTED]	Self ([REDACTED])
2022-05-10 10:23:51 (CDT)	Sure	Self ([REDACTED])	[REDACTED]	Self ([REDACTED])
2022-05-12 19:18:52 (CDT)	What's going on with you marketing an SPV to randos? This is not ok.	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-05-12 19:22:58 (CDT)	Not randos, I have the largest angel syndicate and that's how I invest. We've done 250+ deals like this and we know all the folks. I thought that was how folks were doing it.	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-05-12 19:23:28 (CDT)	\$100m+ on commitments, but if that not ok it's fine. Just wanted to support the effort.	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-05-12 19:25:46 (CDT)	~300 QPs and 200 accredited investors said they would do it. It's not an open process obviously, only folks already in our syndicate.	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-05-12 19:28:30 (CDT)	There is *massive* demand to support your effort btw...people really want to see you win.	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-05-12 19:30:30 (CDT)	Morgan Stanley and Jared think you are using our friendship not in a good way	Self ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-05-12 19:31:12 (CDT)	This makes it seem like I'm desperate.	Self ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-05-12 19:31:17 (CDT)	Please stop	Self ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-05-12 19:31:48 (CDT)	Only ever want to support you.	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-05-12 19:37:49 (CDT)	Clearly you're not desperate — you have the worlds greatest investors voting in support of a deal you already have covered. you're overfunded. will quietly cancel it... And to be clear, I'm not out actively soliciting folks. These are our existing LPs not randos. Sorry for any trouble	Jason Calacanis ([REDACTED])	Jason Calacanis ([REDACTED])	Self ([REDACTED])
2022-05-12 19:55:14 (CDT)	Morgan Stanley and Jared are very upset	Self ([REDACTED])	[REDACTED]	Self ([REDACTED])
2022-05-12 19:55:55 (CDT)	Ugh	Jason Calacanis ([REDACTED])	[REDACTED]	Self ([REDACTED])
2022-05-12 19:58:44 (CDT)	SPVs are how everyone is doing there deals now... Luke loved to SPVs etc	Jason Calacanis ([REDACTED])	[REDACTED]	Self ([REDACTED])
2022-05-12 19:59:13 (CDT)	Just trying to support you... obviously. I reached out to Jared and sort it out.	Jason Calacanis ([REDACTED])	[REDACTED]	Self ([REDACTED])
2022-05-12 20:00:53 (CDT)	*moved	Jason Calacanis ([REDACTED])	[REDACTED]	Self ([REDACTED])
2022-05-12 20:01:54 (CDT)	Yes, I had to ask him to stop.	Self ([REDACTED])	[REDACTED]	Self ([REDACTED])
2022-05-12 20:06:45 (CDT)	Liked "Just trying to support you... obviously. I reached out to Jared and sort it out."	Self ([REDACTED])	[REDACTED]	Self ([REDACTED])
2022-05-12 22:49:00 (CDT)	Cleaned it up with Jared	Jason Calacanis ([REDACTED])	[REDACTED]	Self ([REDACTED])
2022-05-12 22:49:12 (CDT)	Liked "Cleaned it up with Jared"	Self ([REDACTED])	[REDACTED]	Self ([REDACTED])
2022-05-12 22:49:58 (CDT)	I get where he is coming from.... Candidly, This deal has just captures the worlds imagination in an unimaginable way. It's bonkers...	Jason Calacanis ([REDACTED])	[REDACTED]	Self ([REDACTED])
2022-05-12 22:51:42 (CDT)	And you know I'm ride or die brother — I'd jump on a grande for you	Jason Calacanis ([REDACTED])	[REDACTED]	Self ([REDACTED])
2022-05-12 22:51:49 (CDT)	Loved "And you know I'm ride or die brother — I'd jump on a grande for you"	Self ([REDACTED])	[REDACTED]	Self ([REDACTED])
2022-06-16 22:04:25 (CDT)	If I understood them correctly, Ned and Parag said that cash expenditures over the next 12 months will be \$78 and that cash receipts will also be \$78. However, the cash receipts number doesn't seem realistic, given that they expect only \$1.2B in Q2, which is just \$4.8B annualized.	Self ([REDACTED])	[REDACTED]	Self ([REDACTED])
2022-06-17 03:30:59 (CDT)	In europe so just getting your msg. I do not have proxy w me but my guess is they are using their proxy numbers vs current reality. we are developing proformas that have lower revenue/receipts and lower disbursements.	[REDACTED]	[REDACTED]	Self ([REDACTED])
2022-06-17 09:32:38 (CDT)	Ok. Given that Q2 is almost over, it obviously doesn't make sense for them to use proxy numbers vs I'm traveling in Europe right now, but back next week.	Self ([REDACTED])	[REDACTED]	Self ([REDACTED])
2022-06-17 10:10:31 (CDT)	i spoke w ned on the 7b receipts/expenses. he said he was trying to be more illustrative on '23 expense base, pre any actions we would take and provide a simplified strawman of possible savings. he said they are not planning on doing an updated fctst for 22/23. i think this is ok re process since i think their fctst would not likely be very good and we wouldn't likely use it anyways. They fly at way too high a level to have a fct of much value. We are in process of developing revenue fct and a range of sensitivities and will then walk thru w them to get their input completely.	Self ([REDACTED])	[REDACTED]	Self ([REDACTED])
2022-06-17 12:47:17 (CDT)	Their revenue projections seem disconnected from reality	Self ([REDACTED])	[REDACTED]	Self ([REDACTED])
2022-06-17 13:39:34 (CDT)	Phew, it's not just me	Self ([REDACTED])	[REDACTED]	Self ([REDACTED])
2022-06-17 13:51:33 (CDT)		Self ([REDACTED])	[REDACTED]	Self ([REDACTED])
2022-06-17 13:54:00 (CDT)		Self ([REDACTED])	[REDACTED]	Self ([REDACTED])

CERTIFICATE OF SERVICE

I, Edward B. Micheletti, hereby certify that on September 28, 2022, a Redacted Version of Exhibits A-J to Letter to The Honorable Kathaleen St. J. McCormick from Edward B. Micheletti, Esquire, regarding Twitter, Inc.'s Motion for Sanctions against Defendants' for discovery misconduct was served electronically via File & ServeXpress upon the following counsel of record:

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