

Exhibit L

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BY FEDERAL EXPRESS

The Honorable Robert M. Levy
United States Magistrate Judge
United States District Court for
the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

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Re: UMG Recordings, Inc. et al. v. Lindor
EDNY No. 05 Civ. 1095 (DGT) (RML)

Dear Magistrate Judge Levy:

The papers we received late Friday in opposition to our simple, unexceptionable June 20th request for rulings demonstrate better than anything I could say the hell on Earth it is litigating with the RIAA's attorneys. It is their clear purpose to do everything the hard way, and to make only the most minimal pretense at good faith which they calculate to be necessary to avoid detection by the Court. I am sure it is obvious that their strategy is to use their bottomless resources to bludgeon the working class victims of their suits into submission, and to distract the Court's attention from the absence of even the barest meritorious claim against defendant. We remind the Court that defendant has never even used a computer in her life, has never purchased a computer, and does not even know if the components left in her house by her childrens' late father even is a computer.

But I think their papers calculate incorrectly, are an insult to the intelligence of the Court, and are based upon the wish that the Court not read the papers which are before it: defendant's simple March 9th set of 7 interrogatories and 7 document requests, and plaintiffs' virtual nonresponses. The golden thread which runs throughout is that they are operating under the delusion that they can litigate by stealth: they think they can come to court, and at the same time avoid showing their hand. But this is not fair and

Honorable Robert M. Levy
United States Magistrate Judge
June 26, 2006
Page 2

it is not the law. Defendant is entitled to know everything that forms the basis of the lawsuit, and is entitled to pretrial discovery that will enable her to defend herself meaningfully at trial.

Plaintiffs' counsel seek to deflect the Court's attention from their 3-month default by devoting reams of paper to non-issues or minor issues regarding the computer inspection and the deposition. The fact, is, though:

1. Depositions of defendant and of her son have been scheduled.
2. A detailed procedure for the mirror imaging of the hard drive has been agreed to, spelled out in 6 paragraphs, and the only question is whether Your Honor feels we should be, or should not be, entitled to what we asked for in paragraph 7, which relates to the period after the inspection, and which would prevent their using the mirror image "by stealth" at trial. It would take Your Honor all of 2 minutes to determine that issue with normal lawyering on both sides.

There are countless misrepresentations and other instances of unfair advocacy in plaintiffs' papers but our client does not have the resources to set a team of attorneys about spending the next 3 days preparing a 100 page response to them, so this brief letter will have to do.

Respectfully submitted,



Ray Beckerman (RB 8783)

cc: J. Christopher Jensen, Esq. (by Federal Express)
Richard Gabriel, Esq. (by Federal Express)