

EXHIBIT B

From: [Baddish, Noa](#)
To: tblackburn@tablackburnlaw.com
Cc: [Bloom, Elise M.](#)
Subject: RE: Lampros v. Combs et al., Index No. 154859/2024
Date: Friday, June 28, 2024 12:29:26 PM

Mr. Blackburn,

Per our discussion earlier this week, this email is to confirm that you agreed to a 45-day extension up to and including August 19 for SME to respond to the Complaint in the above-captioned action. Before we send you a stipulation to that effect, we wanted to raise the fact that it is unclear whether SME is even a separate defendant based on the caption in the Complaint and alert you to the fact that if it is, SME is improperly named as a defendant because it was not formed until July 1, 2004, and therefore was not in existence at the time the allegations in the complaint took place. **Please advise by Monday whether you will agree to dismiss SME from the action.** We also note that you have not filed a corrected affidavit of service for SME on the docket as we had discussed, and the only affidavit of service filed indicates that you served a different entity.

We are also counsel for Arista Records LLC, which is incorrectly named in the Complaint as "Arista Records." We are authorized to accept service on behalf of Arista Records LLC if you will agree to correct the name of the entity in the Complaint to "Arista Records LLC." Please let us know how you would like to proceed.

Thank you,
Noa

Noa Michelle Baddish
Senior Counsel

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From: Baddish, Noa
Sent: Tuesday, June 25, 2024 12:54 PM
To: 'tblackburn@tablackburnlaw.com' <tblackburn@tablackburnlaw.com>
Cc: Bloom, Elise M. <ebloom@proskauer.com>
Subject: RE: Lampros v. Combs et al., Index No. 154859/2024

Tyrone,

Per our discussion, attached is the affidavit of service filed on the docket. I write to confirm our

discussion that Ms. Lampros is only suing SME, not Sony Music Holdings and the caption on the affidavit of service naming defendants that are not named in the complaint (Index No. 154859/2024, NYSCEF Doc. No. 1) is incorrect as is the statement on the affidavit of service that Sony Music Holdings was served with the complaint in this action as Sony Music Holdings is not a defendant. The only named defendants in the action filed by Ms. Lampros are: Sean Combs, Bad Boy Records, and Arista Records, a subsidiary of SME.

Thank you,
Noa

Noa Michelle Baddish

Senior Counsel

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From: Tyrone Blackburn <tyrone.a.blackburn@gmail.com>

Sent: Tuesday, June 25, 2024 11:19 AM

To: Baddish, Noa <nbaddish@proskauer.com>

Cc: Bloom, Elise M. <ebloom@proskauer.com>

Subject: Re: Lampros v. Combs et al., Index No. 154859/2024

This email sent by tyrone.a.blackburn@gmail.com originated from outside the Firm.

tblackburn@tablackburnlaw.com

On Mon, Jun 24, 2024 at 12:15 PM Baddish, Noa <nbaddish@proskauer.com> wrote:

Mr. Blackburn,

We were just retained to represent Defendant Sony Music Entertainment in the above-captioned matter. We write to request a 45-day extension until August 19 to respond to the complaint. Please advise whether you consent at your earliest convenience.

Thank you,
Noa

Noa Michelle Baddish

Senior Counsel

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