Exhibit B

PLAINTIFF CRUSOE ENERGY SYSTEMS LLC'S REPLY IN SUPPORT OF MOTION TO RESTRICT ACCESS

Stephanie DeBrow

From: Stephanie DeBrow
Sent: Tuesday, September 6, 2022 9:04 AM
To: Sugden, Ryan; Brett C. Govett
Cc: Schroeder, John R.
Subject: RE: Crusoe/Alkane - conferral on motion for expedited discovery
Attachments: 2022.08.22 Dkt 12 Crusoes First Set of Requests for Production to Defendant.pdf; 2022.08.22 Dkt 12-1 REDACTED Crusoe First Set of Requests for Admission to Defendant.pdf; 2022.08.22 Dkt 12-2 Crusoe First Set of Interrogatories to Defendant.pdf; 2022.08.22 Dkt 12-3 Crusoe Deposition Topics.pdf

Ryan,

In light of the Court's guidance during the status conference last week, we revisited the confidentiality designations for the discovery requests in an effort to limit redactions/confidentiality designations to the bare minimum we believe necessary to avoid running afoul of the confidentiality restrictions in the agreement between Crusoe and [redacted].

I have attached a redacted version of Crusoe's First Set of RFAs that you may share with your client. We will withdraw our requests to restrict access to Crusoe's First Set of RFPs, First Set of ROGs, and deposition topics—those may be shared with your client without restriction.

To the extent Alkane objects to any of the discovery requests, please let us know when we can expect to receive a draft from you of the discovery dispute table required by Judge Wang.

Best regards,

Stephanie DeBrow | Partner
Norton Rose Fulbright US LLP
Tel +1 512 536 3094
stephanie.debrow@nortonrosefulbright.com

NORTON ROSE FULBRIGHT

From: Sugden, Ryan <Ryan.Sugden@stinson.com>
Sent: Monday, September 5, 2022 1:03 PM
To: Brett C. Govett <brett.govett@nortonrosefulbright.com>; Stephanie DeBrow <stephanie.debrow@nortonrosefulbright.com>
Cc: Schroeder, John R. <john.schroeder@stinson.com>
Subject: Crusoe/Alkane - conferral on motion for expedited discovery

[External Email – Use Caution]

Counsel:

As you know, Judge Wang ordered us to meet and confer regarding Crusoe's motion for expedited discovery. However, the requests remain subject to your motion to restrict access in which you have requested that they be seen by outside counsel only. As I've indicated, we disagree that merely requesting Level 1 restricted access is sufficient to keep a document AEO, but we have respected your designation until the court orders otherwise. As such, we have yet to share the requests with Alkane. We cannot meaningfully confer with you on the discovery requests until we talk with our client and get its input on the burden the requests impose. Now that an interim protective order has been entered, can you prepare an at least redacted version of the discovery requests that we can share with our client? Once we share the requests with our client, we can schedule a time to confer.

Thank you,

Ryan M. Sugden
Partner

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