

EXHIBIT 2

From: Levy, Joshua S.
Sent: Monday, August 26, 2024 5:27 PM
To: Daniel Herrera; Palmeri, Vincent; Cheney, Alexander; Lombardi, Stuart; Morris, Daniel L.; Hanley, Katherine; Morton, Adriana
Cc: Jorge L. Piedra; Dwayne Robinson; Michael Lorigas; Simon S. Grille
Subject: RE: Benworth Capital Partners LLC v. Oto Analytics, LLC Meet and Confer

Daniel,

Thank you for reaching out. We have been tied up today with our opposition to Benworth's Petition to Vacate. Since that brief was nearly complete when you sent your proposal, we did not see any reason not to file it. We are in the process of filing now so your request #1 is moot.

For Request #2, we do not agree to a 10-day extension or a 60-page limit. We sent you a proposal regarding the parties consenting to a magistrate judge and Womply agreeing not to move to strike Benworth's petition as exceeding the page limits under the rules. Do you have a response or a counter-proposal? Your email below does not mention this, so it was unclear if Benworth was rejecting our proposal.

For Request #3, please provide your proposal regarding sealing so we can have a productive discussion about it later this week.

We can be available to discuss any of this tomorrow.

Regards,
Josh

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From: Daniel Herrera <dherrera@kttlaw.com>
Sent: Sunday, August 25, 2024 11:47 AM
To: Levy, Joshua S. <JLevy@willkie.com>; Palmeri, Vincent <VPalmeri@willkie.com>; Cheney, Alexander <ACheney@willkie.com>; Lombardi, Stuart <slombardi@willkie.com>; Morris, Daniel L. <DMorris@willkie.com>; Hanley, Katherine <KHanley@willkie.com>; Morton, Adriana <AMorton@willkie.com>
Cc: Jorge L. Piedra <jpiedra@kttlaw.com>; Dwayne Robinson <d robinson@kttlaw.com>; Michael Lorigas <mlorigas@kttlaw.com>; Simon S. Grille <sgrille@girardsharp.com>
Subject: Benworth Capital Partners LLC v. Oto Analytics, LLC Meet and Confer

*** EXTERNAL EMAIL ***

Counsel,

We would like to have a meet and confer on Monday via zoom to discuss the following items:

1. Response to Womply's Motion to Confirm. Instead of doing briefing separately on Womply's petition to confirm and Benworth's petition to vacate, we propose doing it all together. In other words, Benworth's response to Womply's motion would also be a cross-petition to vacate. Under our proposal, Womply would respond in opposition to that (instead of the petition filed in the related action), and then Benworth will file a reply that solely addresses our cross-petition components. Are you agreeable to this?

2. Extension of Time and Enlargement of Page Limits. Benworth intends to move the Court for an expansion of the page limits for its response/cross petition. Along with the request for additional pages, we intend to ask the Court to extend our deadline to oppose Womply's motion to confirm until 10 days after it rules on the request for additional pages. Would Womply be willing to stipulate to this, and a limit of 60 pages?

3. Sealing Documents. As a follow-up to our conversation last week, we would like to discuss our competing motions to seal.

4. Consolidation. Benworth agrees to consolidate the two actions.

Please let me know you availability.

Best,

DANIEL HERRERA, ESQ.



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