

Read & Co.

N. Read & Co. PLLC  
260 Madison Avenue, 16th Floor  
New York, NY 10016

Nathaniel P. T. Read  
212-750-3771  
nread@readandco.com

October 19, 2026

**BY ECF**

Hon. Paul A. Engelmayer  
United States District Judge  
United States District Court, Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Reddit, Inc. v. SerpApi LLC, et al.*, 1:25-cv-08736-PAE

Dear Judge Engelmayer:

I write on behalf of Defendant Perplexity AI, Inc. (“Perplexity”), regarding the Court’s October 19, 2026 Order (the “Production Order,” ECF 173) directing the production of documents related to Perplexity’s motion to authorize Proskauer to appear as its counsel in this action (the “Motion,” ECF 126-129, 166, 171). As the Court knows, the Production Order requires Perplexity to produce by October 26, 2026,

all written communications between any lawyer, employee, or representative of Perplexity, and [any] lawyer or employee of Proskauer, between October 22, 2025 and the present, concerning, or referring or relating in any way to, a representation, or a possible or future representation, by Proskauer of Perplexity, including but not limited to a representation in this action.

Perplexity respectfully submits that the Production Order imposes an undue burden and requests that the Court narrow the Production Order or permit an alternative means of compliance to avoid that result.

Beginning well before October 2025 and continuing through the present, Proskauer has represented Perplexity in a variety of matters, including commercial transactions and litigations unrelated to this action. *See* Barksdale Decl. (ECF 128) ¶¶ 7-8; Kass Decl. (ECF 129) ¶ 7. Indeed, a preliminary search done today of the term “Proskauer” across the email accounts of Perplexity’s senior in-house legal team has returned over 4,200 emails. This figure does not include attachments or non-email communications.

It appears that all emails and other documents within this search would have to be produced under the Production Order, particularly given the Court’s direction that the “request[] [is] to be read broadly.” ECF 173. Perplexity respectfully submits, however, that the vast



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majority of these documents will relate to actual or potential representation of Perplexity by Proskauer on matters having nothing to do with Reddit or this action. They will thus be protected by the attorney-client privilege (and attorney work product doctrine, where applicable) and have no bearing on the issues raised by Perplexity's Motion or Reddit's opposition thereto.

Perplexity thus respectfully requests that the Court consider limiting the documents required to be produced under the Production Order. For example, perhaps only documents containing the term "Reddit" would need to be produced. As another alternative to the potentially voluminous document production, Perplexity could provide additional information from Mr. Barksdale or Tyler Blake, Senior Counsel, Litigation at Perplexity, if the Court has questions regarding Perplexity's work and relevant communications with Proskauer.

If the Court does not narrow the Production Order, Perplexity will not be able to review and produce all responsive documents in hard copy to the Court by October 26, 2026. Accordingly, Perplexity respectfully requests that it be given until 5 p.m. on Friday, October 23, 2026, to advise the Court when a production can be made.

We are available for a conference regarding these issues at the convenience of the Court and counsel.

Respectfully submitted,

*/s/ Nathaniel P. T. Read*

Nathaniel P.T. Read

cc: All Counsel of Record – by ECF