

# Exhibit O

**Caroline Petro Gately**  
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July 22, 2024

**BY EMAIL**

Steven C. Begakis  
Consovoy McCarthy PLLC  
1600 Wilson Boulevard, Suite 700  
Arlington, VA 22209  
steven@consovoymccarthy.com

Re: Studnicki *et al.* / Sage Publications, Inc.

Dear Steven:

Thank you for your letter dated July 15, 2024, requesting Sage to decide whether it will agree to jointly submit the Authors' arbitration demand to AAA with a hearing in the District of Columbia under the AAA Commercial Rules. I thank you also for the time you have spent with me discussing the issues and previewing both the Authors' discovery requests and Sage's objections, neither of which would have occurred in litigation before a court. Our discussions have reflected a common understanding that arbitration is not synonymous with litigation, by design and as intended by our respective clients. We hope that this spirit of cooperation continues throughout the proceedings.

For the reasons we have communicated, Sage will not consent to a hearing under the AAA Commercial Rules without modification of the AAA discovery rule. The California rules that apply to this dispute do not allow for discovery, and the parties were unable to reach a compromise on the scope of limited discovery in a consensual proceeding before the AAA, despite our good faith efforts to do so. Ultimately, the Authors must decide how they intend to prove their claims, and it appears to Sage that they are not willing or able to do so at this time. While this approach seems inconsistent with the Authors' stated desire for an expeditious hearing, we respect their decision to move forward with the appointment of an arbitrator and to defer the discovery discussion until after the appointment.

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As I indicated in my June 20<sup>th</sup> letter, absent agreement on the scope of discovery, the next step to move the arbitration forward is to exchange proposed California arbitrators. We will get to work and send you our list as soon as possible and ask that you do the same.

In the meantime, please let me know if there are other issues you wish to discuss.

Sincerely,

A handwritten signature in black ink, appearing to read "Caroline Petro Gately". The signature is fluid and cursive, with a long horizontal stroke at the end.

Caroline Petro Gately