

EXHIBIT B

UNITED STATES DISTRICT COURT

for the

Northern District of California

DANIEL MILLER

Plaintiff

v.

FACEBOOK, INC.; and YAO WEI YEO

Defendant

Civil Action No. CV-10-264 (WHA)

(If the action is pending in another district, state where:

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES

To: ROCK YOU, INC., 425 Broadway Street, Redwood, CA 94063

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material: SEE ATTACHMENT A

Table with 2 columns: Place (Please mail responsive documents to Heninger, Garrison, Davis, c/o Brian Hancock, P.O. Box 11310, Birmingham, AL 36202 within 10 days of date of service) and Date and Time (01/27/2011 11:04)

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Table with 2 columns: Place and Date and Time (empty)

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: 01/27/2011

CLERK OF COURT

OR

Brian D. Hancock (handwritten signature)

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) PLAINTIFF,

DANIEL MILLER

, who issues or requests this subpoena, are:

BRIAN D. HANCOCK, ESQ, HENINGER, GARRISON & DAVIS, LLC, P.O. BOX 11310, BIRMINGHAM, AL 35202, (205) 326-3336, bdhancock@hgdlawfirm.com

Civil Action No. CV-10-264 (WHA)

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

This subpoena for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the subpoena on the individual at *(place)* _____
_____ on *(date)* _____; or

I left the subpoena at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the subpoena to *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

I returned the subpoena unexecuted because _____; or

other *(specify)*:

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

(c) Protecting a Person Subject to a Subpoena.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the issuing court must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person — except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information;

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or

(iii) a person who is neither a party nor a party's officer to incur substantial expense to travel more than 100 miles to attend trial.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(d) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information.

These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

ATTACHMENT A

DEFINITIONS AND INSTRUCTIONS

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3 1. The terms “YOU,” “YOUR,” or “YOURSELF,” shall mean Spruce Media, Inc.,
4 f/k/a SocialCash, Inc., and/or all of its agents, representatives, accountants, investigators,
5 consultants, attorneys, predecessors, or successors in interest, and anyone else acting OR
6 purporting to act on its behalf or under its control.

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8 2. “FACEBOOK” means, without limitation, Facebook, Inc. (formerly TheFacebook,
9 Inc.), its past and present parents, subsidiaries, affiliates, predecessors, divisions, officers,
10 directors, trustees, employees, staff members, agents, counsel, representatives, consultants, AND
11 ALL PERSONS acting or purporting to act on its behalf.

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13 3. “CHAIN REACTION-TYPE GAMES” refers to any games or gaming applications
14 wherein a user or player seeks to destroy or explode objects on a screen to cause or effect a chain
15 reaction of explosions (or the like) of objects floating on the screen. For instance, CHAIN
16 REACTION-TYPE GAMES would include, but not be limited to, a video game or gaming
17 application wherein a user or player clicks on a floating circle that causes the clicked circle to
18 expand and causes other contacted floating circles to likewise expand in a chain reaction.

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20 4. “BOOMSHINE” means the CHAIN REACTION-TYPE GAME available at
21 <http://k2xl.com/games/boomshine/>.

22 5. “CHAINRXN” means the CHAIN REACTION-TYPE GAME available at
23 <http://chainrxn.zwiggler.com/>.

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25 6. “YEO” means the individual Yaowei Yeo, and all of his agents, representatives,
26 accountants, investigators, consultants, attorneys, predecessors, or successors in interest, and
27 anyone else acting OR purporting to act on his behalf.
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1 7. The term "DOCUMENTS" shall be given the broadest interpretation permissible
2 and shall include, without limitation, any and all printed, written, drawn, graphic, taped, recorded,
3 digitalized, computerized or otherwise electronically or mechanically created writings, images,
4 representations or data of any kind, from whatever source, whether originals, drafts, duplicates,
5 reproductions, facsimiles or copies, whether typewritten, handwritten, printed, recorded,
6 electronically encoded or otherwise produced, reproduced, stored or depicted, whether sent or
7 received or neither, whether printed out on paper or electronically stored, including, but not
8 limited to, any and all correspondence, notes, letters, memoranda, binders, telegrams, cables,
9 telecopies, faxes, emails, electronic transmissions, data compilations, diaries, logs, calendars,
10 chronological records, or listings, minutes, records, books, charts, graphs, reports statements,
11 studies, summaries, slides, PowerPoint or other presentations, drawings, sketches, pictures,
12 diagrams, guidelines, analyses, projections, work papers, financial statements, audits,
13 accountings, reconciliations, accounting records, spreadsheets, tax returns, bills, ledgers, invoices,
14 purchase orders, receipts, checks, applications, offers, contracts, agreements, proposals,
15 questionnaires, mortgages, loans, trusts, licenses, notices, advertisements, brochures, schedules,
16 pamphlets, flyers, forms, policies, computer data, files, printouts, programs, disks, drums, tapes,
17 and any typed, recorded or otherwise electronically or mechanically created sound or visual
18 reproductions, including, but not limited to, cassettes, compact disks, digital recordings, disks,
19 tape recordings, voice mails, film, microfilm, microfiche, photographs, video, and motion
20 pictures.
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25 8. "ALL DOCUMENTS" or "ANY AND ALL DOCUMENTS" shall mean any and
26 all documents that can be located, discovered or obtained by reasonably diligent efforts,
27 including, but not limited to, all documents possessed by you, your attorneys or accountants and
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1 any other person from whom YOU can obtain such documents by request or demand. This term
2 shall be deemed to call for the production of non-identical copies, drafts or versions of a
3 documents, whether they differ by reason of any revisions, notations or otherwise.

4 9. "COMMUNICATION" as used herein means any contact, oral or documentary,
5 formal or informal, at any place or under any circumstances whatsoever whereby information of
6 any nature is transmitted or transferred, including without limitation, any note, memorandum or
7 other record thereof, or a single person seeing or hearing any information by any means.

8 10. "ANY" shall be understood to include and encompass "ALL." As used herein, the
9 singular shall always include the plural and the present tense shall also include the past tense.
10 The words "AND" as well as "OR" shall be construed disjunctively or conjunctively as necessary
11 to bring within the scope of this request ALL DOCUMENTS or things that might otherwise be
12 construed to be outside its scope.

13 11. The spelling of a word in a particular combination of upper and/or lower case
14 letters shall be interpreted to include that word in any other combination of upper and/or lower
15 case letters.

16 12. The use of the singular form of any word includes the plural and vice versa.

17 13. The requested documents include all attachments to a requested document, all
18 envelopes, explanatory notes or memoranda, and any other material that accompanied the
19 document(s). If the specific document elicited a response, that response is also to be produced.

20 14. If you object to the production of any document on the grounds that it is protected
21 from disclosure by the attorney-client privilege, attorney work product doctrine, or any other
22 privilege or doctrine, you are requested to identify each document for which the privilege is
23 claimed and give the following information:
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- a. The name of the person who wrote, sent, or initiated each copy of the document;
- b. The name of the recipient, addressee, or person to whom any copy of the document was sent;
- c. The date of each copy of the document, if any, or an estimate of its date;
- d. A statement of the basis for the claim of privilege; and
- e. A description of the document sufficient for the Court to rule on the applicability and appropriateness of the claimed privilege.

15. If a requested document is unavailable because it has been destroyed, identify that document and state further the identity of the person who ordered them destroyed and the reason for their destruction.

DOCUMENT REQUESTS

1. ALL COMMUNICATIONS AND DOCUMENTS relating to, associated with, OR evidencing, in any way, revenue, advertising or otherwise, generated by the CHAINRXN application developed and/or authorized by YEO and/or Zwiggler.com from January 1, 2006 to present.

2. ALL COMMUNICATIONS AND DOCUMENTS relating to, associated with, OR evidencing, in any way, revenue, advertising or otherwise, generated by the CHAINRXN applications' availability on FACEBOOK and/or FACEBOOK'S Platform from January 1, 2006 to present.

3. ALL COMMUNICATIONS AND DOCUMENTS relating to, associated with, mentioning, or referencing the CHAINRXN application.

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4. ALL COMMUNICATIONS AND DOCUMENTS relating to, associated with,
mentioning, or referencing YEO.