

EXHIBIT A
to Joint Statement #2

1 COLLEEN BAL, State Bar No. 167637
CHARLES TAIT GRAVES, State Bar No. 197923
2 RIANA S. PFEFFERKORN, State Bar No. 266817
WILSON SONSINI GOODRICH & ROSATI
3 Professional Corporation
One Market Plaza
4 Spear Tower, Suite 3300
San Francisco, California 94105-1126
5 Telephone: (415) 947-2000
Facsimile: (415) 947-2099
6 Email: cbal@wsgr.com
tgraves@wsgr.com

7 Attorneys for Defendants
8 Google Inc. and Richard Robinson

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10 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION
12

13 BE IN, INC., a New York corporation,) CASE NO.: 5:12-cv-03373-LHK
14 Plaintiff,)
15 v.) **DEFENDANT GOOGLE INC.'S**
16 GOOGLE INC., a California corporation;) **FIRST SET OF**
RICHARD ROBINSON; and DOES 1 through 3,) **INTERROGATORIES TO**
17 Defendants.) **PLAINTIFF**
18)
19)
20)

21 Pursuant to Federal Rules of Civil Procedure 26 and 33 and the Local Rules of the United
22 States District Court for the Northern District of California, Defendant Google Inc.
23 (“GOOGLE”) hereby demands that Plaintiff Be In, Inc. (“PLAINTIFF”) answer separately and
24 truthfully the following interrogatories in writing under oath within thirty (30) days of service.
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1 **INTERROGATORY NO. 1:**

2 IDENTIFY WITH PRECISION AND SPECIFICITY EACH AND EVERY ALLEGED
3 TRADE SECRET that PLAINTIFF contends GOOGLE unlawfully acquired, used, or disclosed.
4 (“IDENTIFY WITH PRECISION AND SPECIFICITY EACH AND EVERY ALLEGED
5 TRADE SECRET” as used herein means to provide a specific description of each such alleged
6 trade secret, on an individual basis for each such alleged trade secret, in such a manner that the
7 exact identity, scope, boundaries, constitutive elements, and content of each such alleged trade
8 secret are fully disclosed in writing, in contrast to an agglomerated set of conclusory phrases that
9 does not separately list and describe each such alleged trade secret, in contrast to a mere list of
10 documents or file names, and with precision above that required by California Code of Civil
11 Procedure section 2019.210.)

12 **INTERROGATORY NO. 2:**

13 For each ALLEGED TRADE SECRET that PLAINTIFF identified in response to
14 Interrogatory No. 1, identify with precision and specificity the individual(s) PLAINTIFF
15 contends first created each ALLEGED TRADE SECRET and the date(s) of such creation.

16 **INTERROGATORY NO. 3:**

17 For each ALLEGED TRADE SECRET that PLAINTIFF identified in response to
18 Interrogatory No. 1, identify with precision and specificity every third party to whom
19 PLAINTIFF has ever disclosed each such ALLEGED TRADE SECRET.

20 **INTERROGATORY NO. 4:**

21 For each ALLEGED TRADE SECRET that PLAINTIFF identified in response to
22 Interrogatory No. 1, identify with precision and specificity the circumstances under which
23 PLAINTIFF contends GOOGLE received or otherwise obtained each ALLEGED TRADE
24 SECRET, including but not limited to the date(s) when PLAINTIFF contends GOOGLE
25 received or obtained each ALLEGED TRADE SECRET, the identity of the GOOGLE
26 employee(s) or contractors who received or obtained each ALLEGED TRADE SECRET, and
27 any agents or employees of PLAINTIFF who have personal knowledge of each such event.
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1 website accessed, and (d) all documents and information relating to your responses to items (a)
2 through (c) above.

3 **INTERROGATORY NO. 16:**

4 Identify with specificity all evidence that GOOGLE agreed to the CamUp Terms of
5 Service.

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8 Dated: May 29, 2013

WILSON SONSINI GOODRICH & ROSATI

9 By: /s/ Colleen Bal

Colleen Bal

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11 *Attorneys for Defendants*

Google Inc. and Richard Robinson

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