

ANDERSON
& OGILVIE
& BREWER LLP

February 24, 2010

Chief Magistrate Judge Maria-Elena James
United States District Court
450 Golden Gate Avenue
Courtroom B, 15th Floor
San Francisco, CA 94102



Re: *Liu v. Experian Information Solutions, Inc.*
N.D. Cal. case no. C 09-4032 SBA [MEJ]

Dear Judge James:

I am writing to ask the Court to issue a subpoena to Trans Union. I have discussed this with Experian's counsel. Experian does not object to this request.

My client, Ms. Liu, had her identity stolen. She discovered this through an Experian credit report and initiated this lawsuit. Since the Rule 26 conference, we have been trying to discover what credit bureaus, other than Experian, may have furnished her credit report in response to the impostor's credit applications.

Trans Union has refused to produce its files in response to the subpoena because in its view the Fair Credit Reporting Act prohibits it from complying with the subpoena unless the Court has signed it. I disagree but I am trying to get the discovery in the most expedient manner, avoiding unnecessary disputes.

I would be most appreciative if the Court would issue the subpoena and return it to me in the enclosed envelope.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Andrew J. Ogilvie".

Andrew J. Ogilvie

Enc. Subpoena to Trans Union

cc: Eric Hardeman, Jones Day, Irvine [(949) 553-7545] w/ enc.

UNITED STATES DISTRICT COURT

for the

Northern District of California

MeiQing Liu)
Plaintiff)
v.) Civil Action No. C 09-04032 SBA
Experian Information Solutions, Inc.)
Defendant) (If the action is pending in another district, state where:)

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Trans Union LLC

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 attached list of documents to be produced. Electronically stored documents to be produced in hard copy to the extent possible.

Table with 2 columns: Place and Date and Time. Place: Anderson, Ogilvie & Brewer LLP, 600 California St., 18th Fl, San Francisco, CA 94108 (415) 651-1952. Date and Time: 03/31/2010 10:00 am

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. Both fields are 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: 02/26/2010

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) MeiQing Liu, who issues or requests this subpoena, are:

Andrew J. Ogilvie
Anderson, Ogilvie & Brewer LLP, 600 California Street, 18 Fl., San Francisco, CA 94108
andy@aoblawyers.com 415/651-1952 direct line

Categories of Documents Subpoenaed from

Trans Union LLC

You are subpoenaed to produce all documents in your possession, custody or control relating to MeiQing Liu, whose Social Security Number (SSN) is **[Redacted]**, or any person who has used or been associated with that SSN. This subpoena includes but is not limited to the following types of documents insofar as they relate to MeiQing Liu or someone using her identity to apply for credit.

1. All documents that constitute, refer or relate to communications between Trans Union and MeiQing Liu or any person purporting to be her or using her SSN.

2. All documents that constitute, refer to or relate to Trans Union's file on MeiQing Liu or any person using her SSN, including but not limited to its frozen data scans, audit trail documents, all records of inquiries by subscribers, all CDVs and ACDVs, and all correspondence, notes or other documents that refer or relate to those files at Equifax.

3. All documents that list or disclose the names of persons to whom Trans Union has disclosed its credit report on MeiQing Liu or any person associated with her SSN at any time.

4. All documents that list or disclose the consumer identification

information that was provided to Trans Union by any person to whom Trans Union furnished MeiQing Liu's credit report.

5. All documents that constitute, refer to or relate to Trans Union's investigation(s) or reinvestigation(s) of any information contained in its file on MeiQing Liu or other person using her SSN.

6. All documents that constitute, refer to or relate to any communications between Trans Union and any Furnisher concerning any information about MeiQing Liu's accounts, addresses, or other information concerning her, or the accounts that used her SSN.

7. All documents that explain what Trans Union requires the consumer to furnish as "proper identification" under § 1681h(a)(1) as a condition of sending the consumer a copy of his/her consumer disclosure.