

# **EXHIBIT 15**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

PETROLIAM NASIONAL BERHAD  
(PETRONAS),

Plaintiff,

CASE NO. 09-CV-5939PJH

vs.

[GODADDY.COM](http://GODADDY.COM), INC.,

Defendant.

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::: CONFIDENTIAL :::

30 (b) (6) DEPOSITION OF ROD SIMONINI

DATE: Wednesday, October 12, 2011

TIME: 2:54 p.m.

LOCATION: BALLARD SPAHR, LLP  
1 East Washington Street, Suite 2300  
Phoenix, Arizona 85004

REPORTED BY: JANICE HARRINGTON, RPR, CRR, CLR  
AZ Certified Court Reporter No. 50844  
Registered Professional Reporter  
Certified Realtime Reporter  
Certified LiveNote Reporter

MBreporting  
111 Deerwood Road, Suite 200  
San Ramon, California 94583

1 A. Current -- in domain services,  
2 approximately three years.

3 Q. And what did you do before that?

4 A. Customer Care Rep.

5 Q. Okay. And when you say you do trademark  
6 infringement claims, could you describe those for me?

7 A. Third-party trademark infringement  
8 claims. We receive complaints on a website, we'll  
9 investigate it.

10 Q. How many people are in your department?

11 A. Approximately 30.

12 Q. And how many people are responsible for  
13 working on the trademark claims that Go Daddy  
14 receives?

15 A. Five.

16 Q. And do you have a rough approximation of  
17 how many trademark claims Go Daddy receives each  
18 year?

19 A. Over 1,000.

20 Q. And are these claims related to Go  
21 Daddy's domain name services or other services?

22 A. Domains and hosting.

23 Q. Okay. So those are the two services for  
24 which your department handles complaints?

25 A. For trademark, yes.


1 CERTIFICATE

2  
3 I, Janice E. Harrington, Certified Court  
4 Reporter for the State of Arizona, certify:

5 That the foregoing deposition was taken  
6 by me; that I am authorized to administer an oath;  
7 that the witness, before testifying, was duly sworn  
8 by me to testify to the whole truth; that the  
9 questions propounded by counsel and the answers of  
10 the witness were taken down by me in shorthand and  
11 thereafter reduced to print by computer-aided  
12 transcription under my direction; that deposition  
13 review and signature was requested; that the  
14 foregoing pages are a full, true, and accurate  
15 transcript of all proceedings and testimony had upon  
16 the taking of said deposition, all to the best of my  
17 skill and ability.

18 I FURTHER CERTIFY that I am in no way  
19 related to nor employed by any of the parties hereto  
20 nor am I in any way interested in the outcome hereof.

21 DATED this 25th day of October, 2011

22  
23   
24 Janice E. Harrington  
25 Certified Court Reporter No. 50844  
For the State of Arizona