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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN JOSE DIVISION**

11 **GOOGLE INC., AOL LLC, YAHOO!**  
12 **INC., IAC SEARCH & MEDIA, INC., and**  
13 **LYCOS, INC.**

14 **Plaintiffs**

15 **v.**

16 **L. DANIEL EGGER, SOFTWARE**  
17 **RIGHTS ARCHIVE, LLC, and SITE**  
18 **TECHNOLOGIES, INC.**

19 **Defendants**

**Case No. CV08-03172RMW**

**DEFENDANTS' OBJECTIONS TO**  
**PLAINTIFFS' NOTICE OF DEPOSITION**  
**OF L. DANIEL EGGER**

20 Defendants L. Daniel Egger, Software Rights Archive, LLC, and Site Technologies, Inc.  
21 object to Plaintiffs' Notice of Deposition of L. Daniel Egger. Defendants and Plaintiffs agreed  
22 that Egger's deposition would take place for four hours on January 27, 2009 at "such other time  
23 and place as may be agreed upon by the parties." Out of an excess of caution, Defendants object  
24 to Plaintiffs' failure to limit the proposed deposition to four hours in length. Defendants also  
25 object to Plaintiffs' failure to limit the subject matter of the deposition to Egger's contacts with  
26 California in his individual capacity. Personal jurisdiction over Egger is the only matter  
27 presently in dispute to which Egger has relevant knowledge, and it is only Egger's contacts with  
28 California in his individual capacity that Plaintiffs can reasonably use to try to establish personal  
jurisdiction over Egger in this case. Four hours is a reasonable length of time for discovering

1 Egger's knowledge of his personal contacts with California, because Egger has already attested  
2 on penalty of perjury that his contacts with California in his individual capacity have been very  
3 limited.

4 Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing instrument has been forwarded to all counsel of record pursuant to Federal Rules of Civil Procedure on this the 29th day of December, 2008.

  
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