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10 Attorneys for Plaintiff  
FACEBOOK, INC.

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

15  
16 FACEBOOK, INC.,  
17 Plaintiff,  
18 v.  
19 STUDIVZ LTD., HOTLZBRINCK  
20 NETWORKS GmBH, HOLTZBRINCK  
VENTURES GmBH, and DOES 1-25,  
21 Defendant.

Case No. 5:08-cv-03468 JF  
**FACEBOOK, INC.'S SECOND SET  
OF REQUESTS FOR PRODUCTION  
TO DEFENDANT HOTLZBRINCK  
VENTURES GmBH RELATING TO  
PERSONAL JURISDICTION**  
  
(SET TWO: 31 – 32)

22 YOU ARE HEREBY REQUESTED, pursuant to Rule 34 of the Federal Rules of  
23 Civil Procedure, to respond to the following requests for production separately and fully, in  
24 writing, and under penalty of perjury, within thirty (30) days after service or whatever date is  
25 ordered by the Court, whichever is sooner.  
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Facebook, Inc. v. Studivz, Ltd et al

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**REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 31**

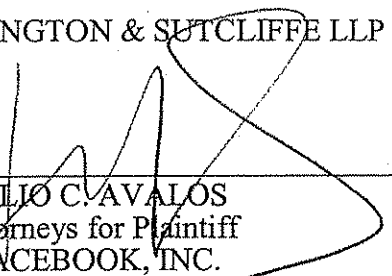
ALL DOCUMENTS OR COMMUNICATIONS RELATING TO YOUR knowledge of  
FACEBOOK's legal claims against STUDIVZ, including, but not limited to, the means by which  
YOU first gained that knowledge.

**REQUEST FOR PRODUCTION NO. 32**

ALL DOCUMENTS OR COMMUNICATIONS RELATING TO similarities between the  
FACEBOOK WEBSITE and the STUDIVZ WEBSITES, including, but not limited to, graphical  
similarities, layout similarities, functional similarities, and feature similarities.

Dated: January 30, 2009

ORRICK, HERRINGTON & SUTCLIFFE LLP



---

JULIO C. AVALOS  
Attorneys for Plaintiff  
FACEBOOK, INC.

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10 Attorneys for Plaintiff  
FACEBOOK, INC.

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

15  
16 FACEBOOK, INC.,

17 Plaintiff,

18 v.

19 STUDIVZ LTD., HOTLZBRINCK  
20 NETWORKS GmBH, HOLTZBRINCK  
VENTURES GmBH, and DOES 1-25,

21 Defendant.

Case No. 5:08-cv-03468 JF

**FACEBOOK, INC.'S SECOND SET  
OF REQUESTS FOR PRODUCTION  
TO DEFENDANT HOTLZBRINCK  
NETWORKS GmBH RELATING TO  
PERSONAL JURISDICTION**

**(SET TWO: 31-32)**

22  
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24 Civil Procedure, to respond to the following requests for production separately and fully, in  
25 writing, and under penalty of perjury, within thirty (30) days after service or whatever date is  
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**REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 31**

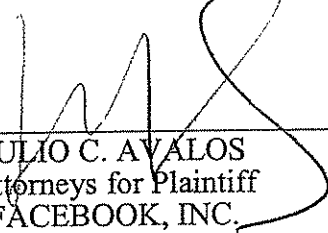
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**REQUEST FOR PRODUCTION NO. 32**

ALL DOCUMENTS OR COMMUNICATIONS RELATING TO similarities between the FACEBOOK WEBSITE and the STUDIVZ WEBSITES, including, but not limited to, graphical similarities, layout similarities, functional similarities, and feature similarities.

Dated: January 30, 2009

ORRICK, HERRINGTON & SUTCLIFFE LLP

  
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12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN JOSE DIVISION

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16 FACEBOOK, INC.,  
17 Plaintiff,  
18 v.  
19 STUDIVZ LTD., HOTLZBRINCK  
20 NETWORKS GmBH, HOLTZBRINCK  
VENTURES GmBH, and DOES 1-25,  
21 Defendants.

Case No. 5:08-cv-03468 JF  
**FACEBOOK, INC.'S SECOND SET  
OF REQUESTS FOR PRODUCTION  
TO DEFENDANT STUDIVZ, LTD.  
RELATING TO PERSONAL  
JURISDICTION**  
**(SET TWO: 31 – 63)**

22 YOU ARE HEREBY REQUESTED, pursuant to Rule 34 of the Federal Rules of  
23 Civil Procedure, to respond to the following requests for production separately and fully, in  
24 writing, and under penalty of perjury, within thirty (30) days after service or whatever date is  
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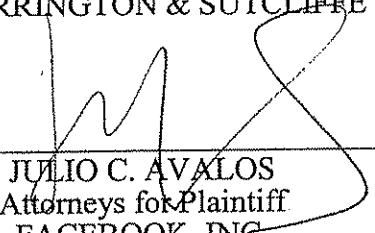
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**REQUEST FOR PRODUCTION NO. 63**

ALL DOCUMENTS AND COMMUNICATIONS that relate to STUDIVZ'S accessing of  
the FACEBOOK WEBSITE for commercial purposes.

Dated: January 30, 2009

ORRICK, HERRINGTON & SUTCLIFFE LLP



---

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11 FACEBOOK, INC.

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN JOSE DIVISION

15  
16 FACEBOOK, INC.,  
17 Plaintiff,  
18 v.  
19 STUDIVZ LTD., HOTLZBRINCK  
20 NETWORKS GmbH, HOLTZBRINCK  
21 VENTURES GmbH, and DOES 1-25,  
22 Defendant.

Case No. 5:08-cv-03468 JF  
**REQUESTS FOR ADMISSION  
RELATING TO PERSONAL  
JURISDICTION**

23 **PROPOUNDING PARTY:** FACEBOOK, INC.  
24 **RESPONDING PARTY:** HOLTZBRINCK VENTURES GMBH  
25 **SET NO.:** ONE (Nos. 1 – 5)  
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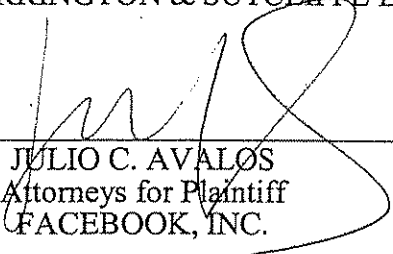
**RECEIVED**  
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1 similarities between the FACEBOOK WEBSITE and the STUDIVZ WEBSITES, including, but  
2 not limited to, visual similarities, functional similarities, feature similarities, and layout  
3 similarities.

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Dated: January 30, 2009

ORRICK, HERRINGTON & SUTCLIFFE LLP



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JULIO C. AVALOS  
Attorneys for Plaintiff  
FACEBOOK, INC.



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12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN JOSE DIVISION

15  
16 FACEBOOK, INC.,

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19 STUDIVZ LTD., HOTLZBRINCK  
NETWORKS GmBH, HOLTZBRINCK  
20 VENTURES GmBH, and DOES 1-25,

21 Defendant.

Case No. 5:08-cv-03468 JF

**REQUESTS FOR ADMISSION  
RELATING TO PERSONAL  
JURISDICTION**

22 **PROPOUNDING PARTY:** FACEBOOK, INC.

23 **RESPONDING PARTY:** HOLTZBRINCK NETWORKS GMBH

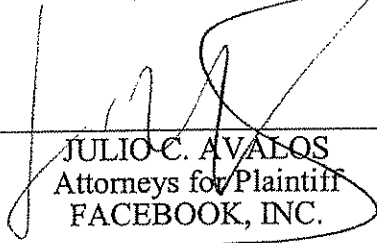
24 **SET NO.:** ONE (Nos. 1 – 5)  
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Dated: January 30, 2009

ORRICK, HERRINGTON & SUTCLIFFE LLP

  
\_\_\_\_\_  
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Attorneys for Plaintiff  
FACEBOOK, INC.

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13 NORTHERN DISTRICT OF CALIFORNIA  
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Case No. 5:08-cv-03468 JF

**REQUESTS FOR ADMISSION  
RELATING TO PERSONAL  
JURISDICTION**

22 **PROPOUNDING PARTY: FACEBOOK, INC.**

23 **RESPONDING PARTY: STUDIVZ LTD**

24 **SET NO.: ONE (Nos. 1 – 22)**

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1 **REQUEST FOR ADMISSION NO. 16**

2 Admit that all USERS OF STUDIVZ are required to agree to a terms of use agreement  
3 prior to receiving full access to the STUDIVZ WEBSITES, their networks, or their features.

4 **REQUEST FOR ADMISSION NO. 17**

5 Admit that since October 2005, COMPUTER CODE for at least one of the STUDIVZ  
6 WEBSITES was or has been altered to account for USERS OF STUDIVZ residing in the United  
7 States, including, but not limited to, the state of California.

8 **REQUEST FOR ADMISSION NO. 18**

9 Admit that STUDIVZ's business, income, revenue or profit models rely, at least in part,  
10 on income from advertising, including, but not limited to, advertisements and advertisement  
11 banners placed on the STUDIVZ WEBSITES.

12 **REQUEST FOR ADMISSION NO. 19**

13 Admit that the number of USERS OF STUDIVZ is a factor taken into account by YOU  
14 when negotiating the cost of advertising on at least one of the STUDIVZ WEBSITES.

15 **REQUEST FOR ADMISSION NO. 20**

16 Admit that STUDIVZ's revenue is based, at least in part, on the total number of USERS  
17 OF STUDIVZ.

18 **REQUEST FOR ADMISSION NO. 21**

19 Admit that at least one of the STUDIVZ WEBSITES was modeled after the FACEBOOK  
20 WEBSITE.

21 **REQUEST FOR ADMISSION NO. 22**

22 Admit that YOU have accessed the FACEBOOK WEBSITE for commercial purposes.

23 Dated: January 30, 2009

ORRICK, HERRINGTON & SUTCLIFFE LLP

24  
25  
26 JULIO C. AVALOS  
Attorneys for Plaintiff  
27 FACEBOOK, INC.  
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10 Attorneys for Plaintiff  
11 FACEBOOK, INC.

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN JOSE DIVISION

15  
16 FACEBOOK, INC.,

17 Plaintiff,

18 v.

19 STUDIVZ LTD., VERLAGSGRUPPE  
20 GEORG VON HOLTZBRINCK GmBH,  
HOTLZBRINCK NETWORKS GmBH,  
21 HOLTZBRINCK VENTURES GmBH, and  
DOES 1-25,

22 Defendant.  
23

Case No. 5:08-cv-03468 JF

PROOF OF SERVICE

1 **PROOF OF SERVICE**

2 I am a resident of the State of California and over the age of eighteen years, and not a  
3 party to the within action. On January 30, 2009, I served the within document(s):

- 4
- 5 • **REQUESTS FOR ADMISSION RELATING TO PERSONAL JURISDICTION TO HOLTZBRINCK NETWORKS GMBH**
  - 6 • **REQUESTS FOR ADMISSION RELATING TO PERSONAL JURISDICTION TO HOLTZBRINCK VENTURES GMBH**
  - 7 • **REQUESTS FOR ADMISSION RELATING TO PERSONAL JURISDICTION TO STUDIVZ LTD.**
  - 8 • **FACEBOOK, INC.'S SECOND SET OF REQUESTS FOR PRODUCTION TO DEFENDANT STUDIVZ, LTD. RELATING TO PERSONAL JURISDICTION**
  - 9 • **FACEBOOK, INC.'S SECOND SET OF REQUESTS FOR PRODUCTION TO DEFENDANT HOTLZBRINCK NETWORKS GmBH RELATING TO PERSONAL JURISDICTION**
  - 10 • **FACEBOOK, INC.'S SECOND SET OF REQUESTS FOR PRODUCTION TO DEFENDANT HOTLZBRINCK VENTURES GmBH RELATING TO PERSONAL JURISDICTION**
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  - 12 • **FACEBOOK, INC.'S SECOND SET OF REQUESTS FOR PRODUCTION TO DEFENDANT HOTLZBRINCK VENTURES GmBH RELATING TO PERSONAL JURISDICTION**
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  - 14 • **FACEBOOK, INC.'S SECOND SET OF REQUESTS FOR PRODUCTION TO DEFENDANT HOTLZBRINCK VENTURES GmBH RELATING TO PERSONAL JURISDICTION**

15 By placing the document(s) listed above in a sealed envelope with postage thereon  
16 fully prepaid, in the United States mail at San Francisco, California addressed as set  
17 forth below on January 30, 2009.

18 By transmitting via facsimile the document(s) listed above to the fax number(s) set  
19 forth below before 5:00 p.m. on October 14, 2008.

20 **X** By causing personal delivery by First Legal Support of the document(s) listed above  
21 to the person(s) at the address(es) set forth below.

22 By personally delivering the document(s) listed above to the person(s) at the  
23 address(es) set forth below.

24 By placing a true and correct copy of the document(s) in a Federal Express envelope  
25 addressed as set forth below and then sealing the envelope, affixing a pre-paid  
26 Federal Express air bill, and causing the envelope to be delivered to a Federal  
27 Express agent for delivery.

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**Stephen S. Smith**  
**William Mielke Walker**  
**GREENBERG GLUSKER FIELDS**  
**CLAMAN & MACHTINGER LLP**  
1900 Avenue of the Stars  
Los Angeles , CA 90067  
Tel: 310-553-3610  
Fax: 310-553-0687  
email: wwalker@greenbergglusker.com

**Attorney for Defendants**  
**STUDIVZ LTD., VERLAGSGRUPPE**  
**HOLTZBRINCK NETWORKS GmBH,**  
**HOTZBRINCK VENTURES GmBH**

Executed on January 30, 2009, at Irvine, California.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

---

Valerie Cloyd