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9 Attorneys for Defendant Fusion Garage PTE Ltd.

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

15 INTERSERVE, INC. dba TECHCRUNCH, a
 16 Delaware corporation, and CRUNCHPAD,
 INC., a Delaware corporation,

17 Plaintiffs,

18 vs.

19 FUSION GARAGE PTE LTD., a Singapore
 20 company,

21 Defendant.

CASE NO. C 09-cv-5812 RS

**SUPPLEMENTAL DECLARATION OF
 PATRICK C. DOOLITTLE IN SUPPORT
 OF OPPOSITION TO MOTION FOR
 PRELIMINARY INJUNCTION**

(Exhibit B Lodged Under Seal)

Date: May 13, 2010

Time: 1:30 p.m.

Judge: Hon. Richard Seeborg

1 I, PATRICK C. DOOLITTLE declare as follows:

2 1. I am a member of the bar of the State of California and a partner in Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Fusion Garage. Unless otherwise noted, I
4 make this declaration of personal knowledge, and if called and sworn as a witness, I could and
5 would testify competently thereto.

6 2. Attached hereto as Exhibit A is a true and correct copy of non-confidential excerpts
7 from the deposition of TechCrunch's 30(b)(6) designee. Plaintiffs have withdrawn the
8 confidentiality designation of these excerpts.

9 3. Attached hereto as Exhibit B is a true and correct copy of excerpts from the
10 deposition of TechCrunch's 30(b)(6) designee, which TechCrunch has designated as Confidential
11 or Confidential-Attorneys' Eyes Only. Due to TechCrunch's assertion of confidentiality over
12 these deposition excerpts, Exhibit B should be filed under seal.

13 4. Attached hereto as Exhibit C is a true a correct copy of a document that Plaintiffs
14 produced in this litigation. This document purports to be an email exchange between TechCrunch
15 personnel Michael Arrington and Heather Harde, along with various Excel spreadsheet
16 attachments. This document was designated as Exhibit 8 to the TechCrunch Rule 30(b)(6)
17 deposition. I understand that Plaintiffs have withdrawn the confidentiality designation of this
18 document.

19 5. Attached hereto as Exhibit D is a true a correct copy of a document that Plaintiffs
20 produced in this litigation. This document purports to be an email exchange between Heather
21 Harde and Chandra Rathakrishnan, in which Harde sends Rathakrishnan a "cap table" offering to
22 acquire Fusion Garage for 23.5% equity in CrunchPad, Inc. This document was introduced as
23 Exhibit 11 to the TechCrunch Rule 30(b)(6) deposition.

24 6. In light of Plaintiffs' recent submission of additional materials in the Supplemental
25 Bridges and Teare Declarations (Dkt. 117, Exs. 3-5), Fusion Garage is submitting this
26 supplemental testimony and exhibits as well. Fusion Garage will withdraw its objections to
27 Plaintiffs' submission of the Supplemental Bridges and Teare declarations, conditioned on
28 Plaintiffs not objecting to this submission.

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

3 Executed this 13th day of May 2010 at San Francisco, California.

4 /s/ Patrick C. Doolittle
5 Patrick C. Doolittle

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