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Attorneys for Defendant Fusion Garage PTE Ltd.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

INTERSERVE, INC. dba TECHCRUNCH, a  
Delaware corporation, and CRUNCHPAD,  
INC., a Delaware corporation,  
  
Plaintiffs,  
  
vs.  
  
FUSION GARAGE PTE LTD., a Singapore  
company,  
  
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 Plaintiffs have withdrawn the  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 I understand that Plaintiffs have withdrawn the confidentiality designation of this  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 13<sup>th</sup> day of May 2010 at San Francisco, California.

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

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