

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
 Claude M. Stern (Bar No. 96737)
 2 claudestern@quinnemanuel.com
 Evette Pennypacker (Bar No. 203515)
 3 evettepennypacker@quinnemanuel.com
 Thomas R. Watson (Bar No. 227264)
 4 tomwatson@quinnemanuel.com
 555 Twin Dolphin Dr., 5th floor
 5 Redwood Shores, CA 94065
 Telephone: (650) 801-5000
 6 Facsimile: (650) 801-5100

7 Joshua L. Sohn (Bar No. 250105)
 Sam S. Stake (Bar No. 257916)
 8 50 California Street, 22nd Floor
 San Francisco, CA 94111
 9 Telephone: (415) 875-6600
 Facsimile: (415) 875-6700

10 Attorneys for Defendant Fusion Garage PTE Ltd.
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13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN FRANCISCO DIVISION
 16

17 TECHCRUNCH, INC., a Delaware
 corporation, and CRUNCHPAD, INC., a
 18 Delaware corporation,
 19 Plaintiffs,
 20 vs.
 21 FUSION GARAGE PTE LTD., a Singapore
 company,
 22 Defendant.
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CASE NO. C 09-cv-5812 RS (PVT)
**DECLARATION OF JOSHUA L. SOHN
 IN SUPPORT OF FUSION GARAGE'S
 OPPOSITION TO PLAINTIFFS'
 MOTION TO COMPEL PRODUCTION
 OF WITHHELD INFORMATION AND
 DOCUMENTS**

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1 I, JOSHUA L. SOHN, declare as follows:

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

6 2. Fusion Garage has produced roughly 35,000 pages of documents, which is nearly
7 double the volume of Plaintiffs' production.

8 3. Fusion Garage has agreed to provide witnesses to testify about the development of
9 its web tablet. The parties are currently trying to schedule depositions in Singapore for November.

10 4. Attached hereto as Exhibit A is a true and correct copy of Plaintiffs' Statement of
11 Misappropriated Business Ideas, dated April 23, 2010.

12 5. Attached hereto as Exhibit B is a true and correct copy of excerpts of Plaintiff
13 TechCrunch's Second Supplemental Responses to Fusion Garage's First Set of Interrogatories,
14 dated July 19, 2010.

15 6. Attached hereto as Exhibit C is a true and correct copy of excerpts from the
16 deposition of Brian Kindle, dated August 19, 2010.

17 7. Attached hereto as Exhibit D is a true and correct copy of excerpts from the
18 deposition of TechCrunch's 30(b)(6) witness, Michael Arrington, dated April 20, 2010.

19 8. Attached hereto as Exhibit E is a true and correct copy of a Twitter message
20 purportedly authored by Michael Arrington, dated August 29, 2010.

21 9. Attached hereto as Exhibit F is a true and correct copy of excerpts from the Twitter
22 feed of Michael Arrington, dated September 15-16, 2010.

23 10. Attached hereto as Exhibit G is a true and correct copy of a document produced by
24 Plaintiffs in this litigation, bearing Bates numbers TC00000557-61.

25 11. Attached hereto as Exhibit H is a true and correct copy of excerpts from the
26 deposition of Heather Harde, dated August 11, 2010.

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