1	QUINN EMANUEL URQUHART & SULLIVAN, LLP		
2	Claude M. Stern (Bar No. 96737) claudestern@quinnemanuel.com		
3	Evette D. Pennypacker (Bar No. 203515) evettepennypacker@quinnemanuel.com Thomas R. Watson (Bar No. 227264) tomwatson@quinnemanuel.com		
4			
5	tomwatson@quinnemanuel.com 555 Twin Dolphin Dr., 5 th floor Redwood Shores, CA 94065		
6	Telephone: (650) 801-5000 Facsimile: (650) 801-5100		
7	Joshua L. Sohn (Bar No. 250105)		
8	joshuasohn@quinnemanuel.com Sam S. Stake (Bar No. 257916)		
9	samstake@quinnemanuel.com 50 California Street, 22nd Floor San Francisco California 04111		
10	San Francisco, California 94111 Telephone: (415) 875-6600		
11	Facsimile: (415) 875-6700		
12	Attorneys for Defendant Fusion Garage PTE Ltd		
13	UNITED STATES DISTRICT COURT		
14	NORTHERN DISTRICT OF CALIFORNIA		
15	SAN FRANCISCO DIVISION		
16	TECHCRUNCH, INC., a Delaware corporation, and CRUNCHPAD, INC., a	CASE NO. C 09-cv-5812 RS (PSG)	
17	Delaware corporation,	DECLARATION OF JOSHUA L. SOHN IN SUPPORT OF FUSION GARAGE'S	
18	Plaintiffs,	MOTION TO COMPEL	
19	VS.	Date: October 18, 2011	
20	FUSION GARAGE PTE LTD., a Singapore company,	Time: 10:00 a.m. Judge: Hon. Paul Singh Grewal	
21	Defendant.	Location: San Jose, Courtroom 5, 4th Floor	
22			
23			
24			
25			
26			
27			
28			
	Case No. C 09-cv-5812 RS (PSG) DECLARATION OF JOSHUA L. SOHN IN SUPPORT OF FUSION GARAGE'S MOTION TO COMPEL		
	Declaration of Joshoa E. Sonn in Surroki of Fusion GARAGE's Motion to compet Dockets.Justia.com		

1	DECLARATION OF JOSHUA L. SOHN	
2	I, Joshua L. Sohn, hereby declare as follows:	
3	1. I am an attorney in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP,	
4	counsel for Fusion Garage PTE Ltd. I have personal knowledge of the facts set forth in this	
5	declaration and, if called upon as a witness, I could and would testify to such facts under oath.	
6	2. On December 21, 2010, I met and conferred with Matthew Scherb, now former	
7	counsel for Plaintiffs, regarding Plaintiffs' refusal to produce documents in response to Fusion	
8	Garage Request for Production Nos. 97, 98, 99, 100, 102, and 103 relating to the alleged	
9	partnership and resulting litigation between TechCrunch and Jason Calacanis. Mr. Scherb stated	
10	that Plaintiffs were unwilling to produce documents responsive to these requests on the grounds	
11	they are not relevant to the instant litigation.	
12	3. Mr. Sherb and I further discussed whether Plaintiffs would agree to produce	
13	documents responsive to Fusion Garage's Requests for Production Nos. 93 and 94 regarding	
14	TechCrunch's acquisition by AOL, including the final, signed agreements. Mr. Scherb stated that	
15	he would confer with Plaintiffs and later confirm whether Plaintiffs would agree to produce these	
16	documents.	
17	4. Attached hereto as Exhibit 1 is a true and correct copy of my letter to Mr. Scherb,	
18	dated December 21, 2010, memorializing our meet and confer.	
19	5. Attached hereto as Exhibit 2 is a true and correct copy of Mr. Scherb's January 7,	
20	2011 letter responding to my December 21, 2010 letter in which Plaintiffs stated they would	
21	produce its AOL related documents "in early March," but would not produce the final	
22	TechCrunch/AOL acquisition agreements.	
23	I declare under penalty of perjury under the laws of the United States of America that the	
24	foregoing is true and correct.	
25	Executed on September 9, 2011, at San Francisco, California.	
26		
27	<u>/s/ Joshua L. Sohn</u> Joshua L. Sohn	
28		
	-1- Case No. C 09-cv-5812 RS (PSG) DECLARATION OF JOSHUA L. SOHN IN SUPPORT OF FUSION GARAGE'S MOTION TO COMPEL	