

Winston & Strawn LLP  
101 California Street  
San Francisco, CA 94111-5802

1 WINSTON & STRAWN LLP  
David S. Bloch (SBN: 184530)  
2 dbloch@winston.com  
J. Caleb Donaldson (SBN: 257271)  
3 jcdonaldson@winston.com  
101 California Street  
4 San Francisco, CA 94111-5802  
Telephone: (415) 591-1000  
5 Facsimile: (415) 591-1400

6 Attorneys for Plaintiffs

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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**

11  
12 TECHCRUNCH, INC., et al.

13 Plaintiffs,

14 vs.

15 FUSION GARAGE PTE. LTD.,

16 Defendant.

) **Case No. C 09-cv-05812-RS (PSG)**

) **DECLARATION OF J. CALEB**  
) **DONALDSON IN SUPPORT OF**  
) **PLAINTIFFS' OPPOSITION TO FUSION**  
) **GARAGE'S MOTION TO COMPEL**  
) **PRODUCTION OF DOCUMENTS**

) **Date: January 3, 2012**

) **Time: 10:00 a.m.**

) **Judge: Hon. Paul Singh Grewal**

) **Location: San Jose, Courtroom 5, 4<sup>th</sup>**  
) **Floor**

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20 I, J. Caleb Donaldson, declare pursuant to 28 U.S.C. § 1746 under penalty of perjury that the  
21 following is true and correct:

22 1. I an associate with the law firm of Winston & Strawn LLP, counsel of record for  
23 Plaintiffs in this action.

24 2. Attached as Exhibit A is a true and correct copy (with highlighting added) of an email  
25 from Chandrasekar Rathakrishnan to Jonathan Bloom that Defendant produced in the course of  
26 discovery in this case.

27 3. Attached as Exhibit B is a true and correct copy of the docket sheet for *Calacanis v.*  
28 *Interserve, Inc. dba TechCrunch*, Case Number CGC-10-505374 in California Superior Court, San

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Francisco County.

4. Attached as Exhibit C is a true and correct copy of an email (with highlighting added) from Jonathan Bloom to Chandrasekar Rathakrishnan that Defendant produced in the course of discovery in this case.

Executed on December 2, 2011.

/s/ \_\_\_\_\_  
J. Caleb Donaldson