

EXHIBIT C

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8
9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 INTERSERVE, INC. dba TECHCRUNCH, a)
12 Delaware corporation, and CRUNCHPAD,)
13 INC., a Delaware corporation,)

14 Plaintiffs,)

15 vs.)

16 FUSION GARAGE PTE. LTD., a Singapore)
17 company,)
Defendant.)

Case No. C 09 5812 JW (PVT)

PLAINTIFF TECHCRUNCH'S SECOND
SET OF REQUESTS FOR PRODUCTION
OF DOCUMENTS

18 PROPOUNDING PARTY: INTERSERVE, INC. dba TECHCRUNCH

19 RESPONDING PARTY: FUSION GARAGE

20 SET NO.: TWO

21 Pursuant to Federal Rule of Civil Procedure 34 Plaintiff Interserve, Inc. d/b/a TechCrunch
22 requests that Defendant Fusion Garage Pte. Ltd. produce for inspection and copying the documents
23 and things listed below thirty days from service of this request to the offices of Winston & Strawn
24 LLP, 101 California Street, San Francisco, CA 94111, or at another location mutually agreed upon
25 by both parties.

26 For the purpose of this request for production of documents and things, the following
27 instructions shall apply and the following terms will have the meaning indicated:
28

INSTRUCTIONS

1
2 1) If you contend that any information, document, or thing otherwise called for by any
3 request is excluded from production or discovery, answer so much of the discovery request as is not
4 subject to the claimed objection and, for each document or thing:

- 5 a) State whether the item shall not be produced because:
6 b) It is claimed to be privileged; or
7 c) It once existed but can no longer be located; or
8 d) It has been lost; or
9 e) It has been destroyed; and

10 2) If, under a claim of privilege, any documents or things are not produced, you must
11 state for each document:

- 12 a) the type and title of the document or thing; and
13 b) the general subject matter of the content of the document or description of the
14 thing; and
15 c) the date of its creation and/or revision; and
16 d) the identity of the document's author(s), addressee(s), and recipient(s); and
17 e) the nature of the privilege being claimed; and
18 f) in detail, all facts upon which you base your claim of privilege.

19 3) In producing these documents and things, you are requested to identify and produce
20 for inspection and copying not only those documents and things in your custody, but all documents
21 and things in the custody of your attorneys, consultants, agents, other representatives, and other
22 persons or entities subject to your control.

23 4) In producing these documents and things, you are to produce the documents and
24 things as they are kept in the ordinary course of business, with appropriate markings or designation
25 so that it may be determined to what request they are responsive.

26 5) You are to produce the original and all copies of each requested document and thing,
27 as well as the file in which they are kept, including all copies which bear any additional file stamps,
28 marginal notes, or other additional markings or writings that do not appear on the original.

1 or marketed entirely without any involvement of TechCrunch or its personnel.

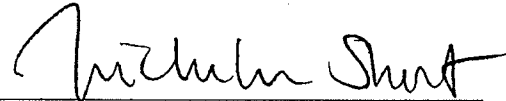
2 **REQUESTS FOR PRODUCTION OF DOCUMENTS**

3 49. All documents concerning government approvals or certifications concerning the
4 JooJoo or the CrunchPad, including but not limited to Federal Communications Commission
5 approval.

6
7 Dated: February 1, 2010

WINSTON & STRAWN LLP

8
9 By:



10 ANDREW P. BRIDGES
11 DAVID S. BLOCH
12 NICHOLAS SHORT
13 Attorneys for Plaintiffs

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