## **EXHIBIT C**

	•						
	1 2 3 4 5 6 7 8	Andrew P. Bridges (SBN: 122761) abridges@winston.com David S. Bloch (SBN: 184530) dbloch@winston.com Nicholas Short (SBN: 253922) nshort@winston.com WINSTON & STRAWN LLP 101 California Street, 39 <sup>th</sup> Floor San Francisco, CA 94111-5802 Telephone: (415) 591-1000 Facsimile: (415) 591-1400 Attorneys for Plaintiffs					
	9	UNITED STATES DISTRICT COURT					
Winston & Strawn LLP 101 California Street San Francisco, CA 94111-5894	10	NORTHERN DISTRICT OF CALIFORNIA					
	11 12 13	INTERSERVE, INC. dba TECHCRUNCH, a) Delaware corporation, and CRUNCHPAD, INC., a Delaware corporation,					
	14	Plaintiffs, PLAINTIFF TECHCRUNCH'S SECOND SET OF REQUESTS FOR PRODUCTION					
		vs. ) SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS					
	15	) FUSION GARAGE PTE. LTD., a Singapore )					
	16	company, Defendant.					
	17	Defendant.					
	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						
	24	and things listed below thirty days from service of this request to the offices of Winston & Strawn LLP, 101 California Street, San Francisco, CA 94111, or at another location mutually agreed upon					
	25						
	26	by both parties. For the purpose of this request for production of documents and things, the following					
	27						
	28	instructions shall apply and the following terms will have the meaning indicated:					
		11					
		PLAINTIFFS' SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS SF:273007.1					
	1						

ł

11

4

Winston & Strawn LLP 101 California Street San Francisco, CA 94111-5894	1	INSTRUCTIONS					
	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, und	er 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 pro	ducing 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.					
		F SF:273007.1	PLAINTI	FFS' SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS			

مردحود إحدار ويحدونه والجرجا حدا

- - ç.

. ,ŧ

and C.C. Course in a contract protection of the second

6) Complete production is to be made on the date and at the time indicated above. The inspection and copying will begin at that time and will continue from day to day thereafter until completed.

7) You have a duty to supplement your responses from now until the time of hearing or trial, as provided by Rule 26(e) of the Federal Rules of Civil Procedure.

## **DEFINITIONS**

1) The terms "document" or "documents" shall have the same meaning as in Federal Rule of Civil Procedure 34 (a) and includes, without limitation, any tangible thing upon which any information has been recorded by any means, including without limitation by writing, printing, typing, transcribing, charting, photographing, photocopying, or by digital, electronic, magnetic, or mechanical recording. The term "documents" includes e-mails and electronic files, audio and video tapes, microfiche, and other electronically stored information. The term "document" also includes non-identical copies or drafts, and all attachments and enclosures.

2) The term "concerning" means relating to, referring to, describing, evidencing, comprising, or constituting.

3) The terms "any" and "all" shall both mean "any and all" as appropriate in order to
bring within the scope of these interrogatories information and documents which might otherwise be
considered to be beyond their scope.

19 4) The term "and" as well as "or" shall be construed either disjunctively or
20 conjunctively as necessary to bring within the scope of these interrogatories information and
21 documents which might otherwise be considered to be beyond their scope.

5) The term "CrunchPad" means any conception, version or prototype of the touchscreen based computer developed by Plaintiff or Defendant or in collaboration between Plaintiff and
Defendant, or identified (internally or externally) as a CrunchPad, whether or not that conception,
version or prototype was publicly exhibited.

26 6) The term "JooJoo" means the touch-screen based computer you offer for sale and
27 brand as the JooJoo, as well as any conceptions, versions, or prototypes of a tablet computer (under
28 the JooJoo name or otherwise) that you have developed, designed, manufactured, had manufactured,

PLAINTIFFS' SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS SF:273007.1

Winston & Strawn LLP 101 California Street San Francisco, CA 94111-5894 1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

	1	or marketed entirely without any involvement of TechCrunch or its personnel.					
	2	<b>REQUESTS FOR PRODUCTION OF DOCUMENTS</b>					
	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: CMMM Ohnt					
	10	DAVID S. BLOCH NICHOLAS SHORT					
	11	Attorneys for Plaintiffs					
LLP eet 11-5894	12						
Strawn rnia Str CA 941	13						
Winston & Strawn LLP 101 California Street San Francisco, CA 94111-5894	14						
	15						
	16						
	17						
	18						
	19						
	20						
	21						
	22						
	23						
	24						
	25						
	26						
	27						
	28						
		4 PLAINTIFFS' SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS					

s espectadada da taganakoa.

.,

----

.....

فالدويد مرزاه