

EXHIBIT I

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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INTERSERVE, INC., dba)
TECHCRUNCH, a Delaware)
corporation, and CRUNCHPAD,)
INC., a Delaware)
corporation,)
Plaintiffs,)

**CERTIFIED
COPY**

vs.)

No. C 09-cv-5812 RS

(PVT)

FUSION GARAGE PTE. LTD., a)
Singapore company,)
Defendants.)

VIDEOTAPED DEPOSITION OF
CHANDRASEKAR RATHAKRISHNAN

Thursday, April 22, 2010

CONFIDENTIAL portions bound separately: Pages 44-49, 94-105,
110-158, and 281-334

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY portions bound
separately: Pages 50-56, 65-66, 106-109, and 159-258

REPORTED BY: DEBRA ALLUSTIARTI CSR 10929 JOB 427851

M E R R I L L C O R P O R A T I O N

10:28:43 1 MR. DOOLITTLE: Objection, vague and
10:28:45 2 ambiguous.
10:28:47 3 THE WITNESS: What do you mean by the
10:28:49 4 purpose of finding -- founding Fusion Garage?
10:28:49 5 MR. BRIDGES: Q. What was your ambition
10:28:53 6 in founding Fusion Garage?
10:29:01 7 A. To create a browser operating system.
10:29:04 8 Q. Did you have any other product or
10:29:05 9 service ambition when you founded Fusion Garage?
10:29:05 10 MR. DOOLITTLE: Objection, vague and
10:29:07 11 ambiguous.
10:29:11 12 THE WITNESS: Nothing that is outside
10:29:19 13 the scope of a browser operating system.
10:29:23 14 MR. BRIDGES: Q. At the creation of
10:29:26 15 Fusion Garage, who were its shareholders?
10:29:28 16 A. At the creation of Fusion Garage, the
10:29:29 17 shareholder was my mother.
10:29:31 18 Q. I'm sorry. Was?
10:29:42 19 A. Was my mother.
10:29:46 20 Q. What's her name? Is her name -- I'll
10:29:49 21 ask you -- Arulampam Sethy Ram?
10:29:50 22 A. It's Arulampam Sethy Rani; that's right.
10:29:59 23 Q. Can you spell that, please.
24 A. A-r-u-l-a-m-p-a-m, and then S-e-t-h-y,
25 space, R-a-n-i.

10:30:10 1 Q. Is she still a shareholder of Fusion
10:30:13 2 Garage?

10:30:13 3 A. She isn't a shareholder of Fusion
10:30:16 4 Garage.

10:30:16 5 MR. DOOLITTLE: Did you say "is" or
10:30:17 6 "isn't"?

10:30:17 7 THE WITNESS: She isn't -- she still
10:30:19 8 isn't a shareholder of Fusion Garage.

10:30:19 9 MR. BRIDGES: Q. But she was at the
10:30:21 10 creation?

10:30:24 11 A. She was at the creation.

10:30:25 12 Q. How did she dispose of her shares?

10:30:26 13 MR. DOOLITTLE: Objection, calls for
10:30:27 14 speculation.

10:30:30 15 THE WITNESS: It was transferred to me.

10:30:30 16 MR. BRIDGES: Q. Did she transfer all
10:30:33 17 her shares to you?

10:30:34 18 A. She transferred all her shares to me.

10:30:37 19 Q. When did that occur?

10:30:41 20 A. Sometime in -- I don't quite recollect
10:30:41 21 this, but I believe it's sometime in
10:30:42 22 September 2010.

10:30:47 23 Q. September?

24 A. Sorry. September 2009.

25 Q. What other shareholders have there ever

10:30:56 1 been in Fusion Garage at any time?

10:31:00 2 A. That's confidential.

10:31:02 3 Q. This case is governed by a protective
10:31:05 4 order, so you may answer.

10:31:05 5 MR. DOOLITTLE: Well, to the extent that
10:31:07 6 that requires you to divulge investor information
10:31:10 7 that hasn't already been divulged to the public or
10:31:11 8 to TechCrunch, I'll instruct you not to answer
10:31:11 9 based on the motion for protective order that was
10:31:15 10 granted.

10:31:15 11 THE WITNESS: So to clarify, what's
10:31:18 12 already public knowledge; is that correct?

10:31:18 13 MR. BRIDGES: Q. What is public
10:31:21 14 knowledge?

10:31:26 15 A. The shareholders includes -- that are
10:31:27 16 public knowledge -- Raffles Technology.

10:31:28 17 Q. What others?

10:31:32 18 A. Stamford.

10:31:34 19 Q. S-t-a-m-f-o-r-d?

10:31:37 20 A. Yeah. Technology.

10:31:40 21 Q. Yes.

10:31:41 22 A. Dr. Bruce Lee.

10:31:43 23 Q. Yes.

24 A. Myself.

25 Q. Yes.

10:31:55 1 A. CSL.

10:31:57 2 Q. That's a Malaysian company?

10:31:58 3 A. Yes.

10:32:01 4 Q. What others?

10:32:02 5 A. That's what's public knowledge.

10:32:04 6 Q. How many shareholders are there who are

10:32:05 7 not known to the public?

10:32:07 8 MR. DOOLITTLE: You can answer that.

10:32:09 9 THE WITNESS: There were two of them.

10:32:10 10 MR. BRIDGES: Q. Where are they

10:32:19 11 located?

10:32:24 12 A. In Singapore and Hong Kong.

10:32:30 13 MR. BRIDGES: Mr. Doolittle, I don't

10:32:33 14 think that your client's entitled to withhold that

10:32:34 15 information based on the order, but we can circle

10:32:35 16 back to that at the end of the day.

10:32:38 17 MR. DOOLITTLE: Okay. We disagree.

10:32:45 18 MR. BRIDGES: I understand.

10:32:46 19 Q. Who have been all of the officers --

10:32:52 20 sorry. Strike that.

10:32:53 21 When you founded Fusion Garage, did it

10:32:54 22 have a board of directors?

10:32:56 23 A. Yes.

24 Q. Who was on the board of directors?

25 A. It was my mother.

10:33:01 1 Q. Anyone else?

10:33:07 2 A. No.

10:33:07 3 Q. Is she still on the board of directors?

10:33:10 4 A. No.

10:33:10 5 Q. When did she cease being on the board of

10:33:13 6 directors?

10:33:16 7 A. I don't quite recollect, but I would

10:33:23 8 think somewhere around the September 2009 period.

10:33:26 9 Q. Who else has been on the board of

10:33:27 10 directors since the founding of the company?

10:33:28 11 A. Myself.

10:33:29 12 Q. Anyone else?

10:33:37 13 A. No.

10:33:42 14 Q. At the founding of Fusion Garage in

10:33:47 15 February of 2009, who were its officers?

10:33:48 16 A. Correction; that the founding of Fusion

10:33:48 17 Garage was February 2008.

10:33:51 18 Q. I'm sorry. I misspoke. I'll restate

10:33:53 19 the question.

10:33:55 20 At the founding of Fusion Garage in

10:34:00 21 February 2008, who were the officers?

10:34:02 22 A. At the founding, it was my mother.

10:34:05 23 Q. Is she still an officer?

24 A. She still isn't an officer.

25 Q. Sorry?

10:34:09 1 A. She's no longer an officer.

10:34:11 2 Q. When did she cease being an officer?

10:34:14 3 A. I don't quite recollect, but I would

10:34:14 4 think it was sometime during the September 2009

10:34:18 5 period.

10:34:19 6 Q. What title did your mother have while

10:34:20 7 she was an officer?

10:34:22 8 A. She was a director.

10:34:24 9 Q. I'm sorry.

10:34:28 10 MR. DOOLITTLE: Well, to clarify, was

10:34:29 11 she an officer or a director or both?

10:34:30 12 THE WITNESS: I don't understand. The

10:34:33 13 distinction, please.

10:34:36 14 MR. BRIDGES: Q. Was she a managing

10:34:38 15 director in Singapore --

10:34:40 16 A. No, she wasn't.

10:34:42 17 Q. What did you understand her title to be

10:34:45 18 when she was the sole officer?

10:34:48 19 A. She was a shareholder and a board of

10:34:51 20 director.

10:34:57 21 Q. What title did you have in

10:35:00 22 September 2009 -- excuse me -- in February 2008?

10:35:02 23 MR. DOOLITTLE: Lacks foundation.

24 THE WITNESS: I was the CEO of Fusion

25 Garage.

10:35:10 1 MR. BRIDGES: Q. Have you always held
10:35:13 2 that title?
10:35:16 3 A. A correction to that: I was a founder
10:35:19 4 and CEO of Fusion Garage.
10:35:20 5 Q. Have you always held those titles?
10:35:27 6 A. Yes.
10:35:30 7 Q. What other officers -- what other
10:35:33 8 officers has Fusion Garage ever had?
10:35:34 9 A. Fusion Garage only had one other
10:35:35 10 officer, and that was myself.
10:35:36 11 Q. What was that office?
10:35:40 12 A. Sorry?
10:35:41 13 Q. You say only had one officer?
10:35:43 14 A. Only had one other officer, and that was
10:35:46 15 myself. So after my mom, it was me.
10:35:47 16 Q. I didn't understand the reference to
10:35:51 17 "other" there.
10:35:52 18 Has Fusion Garage ever had a chief
10:35:52 19 financial officer?
10:35:55 20 A. No.
10:35:55 21 Q. Has it ever had a chief marketing
10:35:56 22 officer?
10:36:00 23 A. No.
24 Q. Has it ever had a chief sales officer?
25 A. No.

10:36:02 1 Q. Has it ever had a chief technology
10:36:04 2 officer?

10:36:04 3 A. No.

10:36:04 4 Q. Has it ever had a chief information
10:36:23 5 officer?

10:36:28 6 A. No.

10:36:29 7 Q. When did Dr. Bruce Lee become an
10:36:32 8 investor?

10:36:40 9 A. I don't quite recollect, but I would
10:36:42 10 think it was between March and April 2008.

10:36:46 11 MR. DOOLITTLE: Let me just caution you:
10:36:49 12 Don't speculate. If you have a best estimate, you
10:36:50 13 can give that best estimate, but he doesn't want
10:36:55 14 you to guess, okay?

10:36:58 15 THE WITNESS: Sure.

10:37:03 16 Just to clarify, again, the question
10:37:03 17 was, when was Dr. Bruce Lee an investor in Fusion
10:37:04 18 Garage?

10:37:08 19 MR. BRIDGES: Q. Yes.

10:37:09 20 A. Yeah, the best estimate would be between
10:37:14 21 the periods of March and April 2008.

10:37:15 22 Q. Was he a shareholder the first time you
10:37:17 23 considered him an investor?

24 A. Yes.

25 Q. I'm going to mention the public

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CERTIFICATE OF REPORTER

I, DEBRA ALLUSTIARTI, a Certified Shorthand Reporter, hereby certify that the witness in the foregoing deposition was by me duly sworn to tell the truth, the whole truth and nothing but the truth in the within-entitled cause;

That said deposition was taken down in shorthand by me, a disinterested person, at the time and place therein stated, and that the testimony of the said witness was thereafter reduced to typewriting, by computer, under my direction and supervision.

That before completion of the deposition, review of the transcript was [] was not [X] requested. If requested, any changes made by the deponent (and provided to the reporter) during the period allowed are appended hereto.

I further certify that I am not of counsel or attorney for either or any of the parties to the said deposition nor in any way interested in the event of this cause and that I am not related to any of the parties thereto.

DATED: April 26, 2010

Debra Allustiarti

DEBRA ALLUSTIARTI CSR, No. 10929