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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

12 INTERSERVE, INC. dba TECHCRUNCH, a
 Delaware corporation, and CRUNCHPAD,
 13 INC., a Delaware corporation,
 14 Plaintiffs,
 15 vs.
 16 FUSION GARAGE PTE. LTD, a Singapore
 company,
 17 Defendant.
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CASE NO. 09-cv-5812 RS (PVT)
DECLARATION OF PATRICK DOOLITTLE IN SUPPORT OF MOTION TO COMPEL PLAINTIFFS' COMPLIANCE WITH THEIR RESPONSES TO REQUESTS FOR PRODUCTION
 Date: TBD
 Time: 10:00 a.m.
 Judge: Hon. Patricia Trumbull

1 I, PATRICK C. DOOLITTLE declare as follows:

2 1. I am a member of the bar of the State of California and a partner in Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Fusion Garage. Unless otherwise noted, I
4 make this declaration of personal knowledge, and if called and sworn as a witness, I could and
5 would testify competently thereto.

6 2. Attached hereto as Exhibit A is a true and correct of Fusion Garage's Requests for
7 Production of Documents (Set One), dated January 8, 2010.

8 3. Plaintiffs served their initial Responses to Fusion Garage's Requests for Production
9 on or about February 8, 2010.

10 4. Attached hereto as Exhibit B is a true and correct copy of a meet and confer letter
11 dated March 10, 2010 that I sent Plaintiffs regarding certain deficiencies in Plaintiffs' discovery
12 responses.

13 5. Attached hereto as Exhibit C is a true and correct copy of a letter that Matthew
14 Scherb, Plaintiffs' counsel, sent on March 12, 2010 in response to my March 10, 2010 letter.

15 6. Attached hereto as Exhibit D is a true and correct copy of Plaintiffs' Supplemental
16 Responses to Fusion Garage's Request for Production of Documents (Set One), dated March 19,
17 2010.

18 7. On or about March 11, 2010, I met and conferred with plaintiffs' counsel about
19 discovery matters. Plaintiffs' counsel represented that we would be receiving documents on or
20 about March 12, 2010 and that we would have the bulk of the key documents by the week of
21 March 15.

22 8. Attached hereto as Exhibit E is a true and correct copy of a March 30, 2010 email
23 exchange between David Bloch, counsel for Plaintiffs, and me regarding the parties' document
24 production.

25 9. Attached hereto as Exhibit F is a true and correct copy of a March 31, 2010 letter
26 from me to David Bloch and Matthew Scherb regarding plaintiffs' document production and
27 interrogatory responses.

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10. Attached hereto as Exhibit G is a true and correct copy of a March 31 to April 1 e-mail exchange between myself and David Bloch regarding plaintiffs’ document production.

11. Attached hereto as Exhibit H is a true and correct copy of an April 2, 2010 letter from Matthew Scherb to me and Joshua Sohn regarding the status of document production and Fusion Garage’s concerns with TechCrunch’s interrogatory responses.

12. Attached hereto as Exhibit I is a true and correct copy of an April 2, 2010 letter that I sent to Matthew Scherb inquiring yet again when we would be receiving plaintiffs’ document production.

13. To date, Plaintiffs have only produced approximately 330 pages of documents.

14. The following time modifications have thus far been ordered in this case: (a) the Court granted expedited discovery before the Rule 26(f) conference (Dkt. 19); and (b) the Court set the hearing on Fusion Garage’s Motion to Dismiss, to Strike, and For a More Definite Statement (Dkt. 20) from May 3, 2010 to May 6, 2010 (Dkt. 45).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 2nd day of April 2010 at San Francisco, California.

/s/ Patrick C. Doolittle
Patrick C. Doolittle