

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LEADER TECHNOLOGIES, INC., a)	
Delaware corporation,)	
)	Civil Action No. 08-862-JJF/LPS
Plaintiff-Counterdefendant,)	
)	
v.)	
)	
FACEBOOK, INC.,)	
a Delaware corporation,)	
)	
Defendant-Counterclaimant.)	

**PLAINTIFF LEADER TECHNOLOGIES, INC.'S NOTICE OF TAKING
DEPOSITION OF DEFENDANT FACEBOOK, INC. PURSUANT TO
FED.R.CIV.P. 30(b)(6)**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30(b)(6), Plaintiff Leader Technologies, Inc. ("Plaintiff" or "Leader") will take the deposition, upon oral examination, of the person or persons designated to testify on behalf of Defendant Facebook, Inc. ("Defendant" or "Facebook") regarding the subject matters set forth in Schedule A.

The deposition will commence on January 25, 2010, at 9:30 a.m. at King & Spalding LLP, 333 Twin Dolphin Drive, Suite 400, Redwood Shores, California, 94065 or at a time and place agreed upon by the parties. The deposition will be taken before a notary public or other officer authorized to administer an oath and will continue from day to day until concluded, or may be continued until completed at a future date or dates.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Fed.R.Civ.P. 30(b)(6)(2), the deposition will be videotaped and/or recorded stenographically.

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

Paul J. André
Lisa Kobialka
James Hannah
King & Spalding, LLP
333 Twin Dolphin Drive
Suite 400
Redwood Shores, California 94065-6109
(650) 590-7100

Dated: January 11, 2010
949180

By: /s/ Philip A. Rovner
Philip A. Rovner (#3215)
Hercules Plaza
P.O. Box 951
Wilmington, DE 19899
(302) 984-6000
provner@potteranderson.com

*Attorneys for Plaintiff-Counterdefendant
Leader Technologies, Inc.*

SCHEDULE A

DEFINITIONS

1. The terms "Plaintiff" and "Leader" shall mean Plaintiff Leader Technologies, Inc., its present and former directors, officers, employees, parent organization(s), subsidiary organization(s), predecessors in interest, successors in interest, divisions, servants, agents, attorneys, consultants, partners, associates, investigators, representatives, accountants, financial advisors, distributors and any other person acting on its behalf, pursuant to its authority or subject to its control.
2. The terms "you," "your," "Facebook," and "Defendant" shall mean Defendant Facebook, Inc. ("Facebook"), its present and former directors, officers, employees, parent organization(s), subsidiary organization(s), predecessors in interest, successors in interest, divisions, servants, agents, attorneys, consultants, partners, associates, investigators, representatives, accountants, financial advisors, distributors and any other person acting on its behalf, pursuant to its authority or subject to its control.
3. The term "Facebook Website" shall mean the Facebook services and network currently located at www.facebook.com and formerly located at www.thefacebook.com (including any directly associated current or former domains), and all functionalities, components, programs and modules (both software and hardware) currently or formerly built, used, or made available by Facebook. "Facebook Website" includes, but is not limited to, all components and information necessary to currently or formerly build, use, and make available Facebook Marketplace, Facebook Flyers, Facebook Platform, Facebook Platform Applications (including, but not limited to Facebook Video, Facebook Notes, Facebook Mobile, Facebook Posted Items, Facebook Photos, Facebook Events, Facebook Gifts, Facebook Groups, Discussion

Boards, Discography, Music Player, Translations, Wall, Reviews, Facebook Exporter for iPhoto and Facebook Toolbar for Firefox), Facebook Mobile Services, Facebook Connect, Facebook Pages, Share Service, Share Link, Facebook Ads, Facebook Beacon, Social Ads, and any other tools which facilitate Site Content or User Content. For purposes of clarification and not limitation, these terms shall have at least the same meaning as used in Facebook's Privacy Policy located at www.facebook.com/policy.php (effective as of November 26, 2008), Terms of Use located at www.facebook.com/terms.php (revised on September 23, 2008), and Product Overview FAQ located at www.facebook.com/press/faq.php (accessed on December 17, 2008). For the purposes of this definition, the "Facebook Website" includes all features implemented by the source code modules identified in Leader's Third Supplemental Response to Facebook's Interrogatory No. 1.

4. The terms "person(s)" and "entit(y, ies)" shall mean, without limitation, any natural person, or association, firm, partnership, corporation or any other form of legal entity, unless the context indicates otherwise.

5. The term "third party" means any person or entity other than Leader or Facebook.

6. The term "Action" refers to Civil Action No. 08-862 filed in the United States District Court for the District of Delaware on November 19, 2008 styled Leader Technologies, Inc. v. Facebook, Inc.

7. The terms "'761 Patent" and "Patent-in-Suit" shall mean United States Patent No. 7,139,761 entitled "Dynamic Association of Electronically Stored Information with Iterative Workflow Changes," the application leading to this patent and any related patent application, including any WIPO, EPO or other foreign counterpart application or patents, any continuations, continuations in part, divisionals, reissues, reexaminations, extensions or parents thereof.

8. The term "document" shall mean all "writings" and "recordings" as those terms are defined in Fed. R. Civ. P. 34(a) and Fed. R. Evid. 1001 as well as any writing or recording of any type, whether written, printed, transcribed, recorded (mechanically or electronically) or reproduced by hand, including, but not limited to, all letters, correspondence, facsimiles, e-mail, telegrams, transcriptions and records of telephone conversations, memoranda, notes, records, reports, statements, minutes, communications, slide presentations, microfilm, microfiche, tape recordings, videotapes, photographs, studies, policy manuals and statements, books, plans, analyses, computer records, runs, programs, software and any code(s) necessary to comprehend the same, test results, notebooks, diaries, agreements, contracts, purchase orders, invoices, advertisements, marketing materials, offer letters, beta site testing agreements, third party or joint development agreements, bills, statements and any other written, printed, typed, recorded or graphic matter, however produced or recorded, including copies and drafts of same, and any handwritten or typewritten notes of any kind thereon or attached thereto. The term "document" shall also include all technical documents, defined as source code, specifications, schematics, flow charts, artwork, drawing, pictures, pictorial representations, formulas, troubleshooting guides, service bulletins, technical bulletins, production specification sheets, white papers, operator manuals, operation manuals, instruction manuals and all other documents sufficient to show the operation of any aspects or elements of your products which includes all past and present releases, revisions, versions and upgrades.

9. The term "communication" shall mean every manner or method of disclosure, transfer or exchange of information, whether orally or by document, and whether face to face, by telephone, mail, e-mail, facsimile, personal delivery or through another medium, including, but

not limited to, discussions, conversations, negotiations, conferences, meetings, speeches, memoranda, letters, correspondence, notes, statements or questions.

10. The words “and” and “or” shall be construed conjunctively or disjunctively in a manner making the request inclusive rather than exclusive.

11. The singular of any word or phrase shall include the plural of such word or phrase, and the plural of any word or phrase shall include the singular of such word or phrase.

DEPOSITION TOPICS

1. Conception, design, structure, development, operation and features of the Facebook Website.
2. Testing and debugging of the Facebook Website.
3. Function, design, structure and layout of current and historical version of the source code of the Facebook Website, including access to the source code of the Facebook Website during the deposition.
4. Tutorials, FAQs, and other instructional material created by Facebook which describes how to use the Facebook Website.
5. Procedure and documents for training new employees involved in the design, structure, development, and operation of the Facebook Website.
6. Facebook's internal documents, including wikis, related to the design, structure, development, and operation of the Facebook Website, including access to the wikis during the deposition.
7. Facebook's internal communication programs, including discussions boards, used by those involved in the design, structure, development, and operation of the Facebook Website, including access to the discussion boards during the deposition.
8. Procedure for implementing, maintaining, or upgrading features of the Facebook Website.
9. Identification of the person or persons most knowledgeable about the most popular features of the Facebook Website, including, but not limited to, Home, Profile, Photos, Video, Groups, Events, Notes, Mobile, Marketplace, News Feed, Wall, Persons You May Know and Advertising.

10. Conception, design, structure, development and operation of the most popular features of the Facebook Website, including, but not limited to, Home, Profile, Photos, Video, Groups, Events, Notes, Mobile, Marketplace, News Feed, Wall, Persons You May Know and Advertising.

11. Identification of the person or persons most knowledgeable about the Falcon architecture (including the user actions and features of the Facebook Website that generate Falcon events), schema.multi, and FBObject.

12. Conception, design, structure, development and operation of the Falcon architecture (including the user actions and features of the Facebook Website that generate Falcon events), schema.multi, and FBObject.

13. Facebook's marketing and marketing strategies relating to marketing, licensing, and selling advertisements on the Facebook Website.

14. Corporate and organizational structure of Facebook.

15. Competitive landscape relating to the Facebook Website.

16. Assessment by Facebook of the value of Facebook and/or the Facebook Website.

17. Assessment by third-parties of the value of Facebook and/or the Facebook Website.

18. Assessment made by Facebook or a third party of the value of Leader, the Patent-in-Suit, or Leader's technology related to the Patent-in-Suit.

19. Sales, revenue, gross profits, and net profits generated from the operation of the Facebook Website from 2004 to present.

20. Forecasts of sales, revenue, gross profits, and net profits from the operation of the Facebook Website from 2004 to present.

21. Any agreements or negotiations between Facebook and a third party to license the technology of the Facebook Website.

22. The marketing and advertisement of the Facebook Website to third parties, including advertisers or individual users.

23. Your methods of generating revenue from operation of the Facebook Website, including means of advertisement on the Facebook Website.

24. Studies, surveys, or analysis describing the features of the Facebook Website that are the most used or popular, including documents indicating that this information is used to solicit advertisers.

25. Your collection and production of responsive information, documents, and things responsive to Leader's discovery requests, including but not limited to the persons responsible for and involved in your document collection and production; actions taken to locate and produce responsive information and documents; files and locations that were searched for responsive information and documents; and communications relating thereto.

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CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on January 11, 2010, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

BY CM-ECF

Thomas P. Preston, Esq.
Steven L. Caponi, Esq.
Blank Rome LLP
1201 Market Street
Wilmington, DE 19801
Preston-T@blankrome.com
caponi@blankrome.com

/s/ Philip A. Rovner
Philip A. Rovner (#3215)
Potter Anderson & Corroon LLP
Hercules Plaza
P. O. Box 951
Wilmington, DE 19899
(302) 984-6000
provner@potteranderson.com