

Confidential Attorneys Eyes Only
Deposition of Michael Levy

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO
Civil Action No. 07-cv-00630-DME-MEH

NETQUOTE INC, a Colorado corporation,
Plaintiff,

vs.

BRANDON BYRD, an internet user making
use of the IP Addresses 64.136.27.226 and
64.136.26.227, and MOSTCHOICE.COM, INC.,
a Georgia corporation,

Defendants. /

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THE TRANSCRIPT ARE DESIGNATED ATTORNEY EYES ONLY

CONTINUED VIDEOTAPED 30(b)(6) DEPOSITION OF

MICHAEL LEVY

September 6, 2007

Volume II

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1 A. For a year or so, yeah.

2 Q. Did MostChoice take any steps to make sure
3 that no NetQuote customer received more than one of
4 MostChoice's false lead requests?

5 A. Did we take any steps to make sure --
6 well, by definition, we can't know what's coming up
7 until after we submit the information. So there's --
8 basically, what our steps were was only submit one
9 per ZIP code per any type of insurance, but I don't
10 know what territories people are in.

11 Q. You gave that instruction for the purpose
12 of trying to canvass to get a complete list of all of
13 NetQuote's insurance agent customers?

14 A. Yeah, we're just interested in finding the
15 customers in the most expedient way possible.

16 Q. There weren't any particular steps to make
17 sure no NetQuote customer got more than one false --
18 false quotation request?

19 A. Right, we -- the only step is that we do
20 not repeatedly submit to the same ZIP code with the
21 same type of insurance.

22 Q. And the purpose of that was because it
23 wasn't expedient for MostChoice, right?

24 A. It would be redundant and, you know,
25 again, I don't believe for a second that any of these