

**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,**

**v.**

**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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**AMENDED NOTICE OF DEPOSITION  
OF PLAINTIFF PURSUANT TO F.R.C.P. 30(B)(6)**

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**NOTICE OF DEPOSITION**

To: Netquote, Inc.

PLEASE TAKE NOTICE that Defendant Mostchoice.com, Inc. will take the deposition of Plaintiff Netquote, Inc. ("plaintiff") pursuant to F.R.C.P. 30(b)(6) before an authorized court reporter at 9:00 o'clock a.m. on Tuesday, September 25, 2007 at the office of the counsel for the plaintiff. Pursuant to F.R.C.P. § 30(b)(3) Mostchoice will videotape this deposition.

Defendant is requested, pursuant to said Rule, to designate one or more of its officers, directors, or managing agents or other persons who consent to testify about matters known or reasonably available. The matters on which each person so designated will be examined will include the following:

1. All factual allegations raised in the plaintiff's complaint, as amended.
2. Netquote's Affiliate program
3. Netquote's Lead filtering system
4. The manner and method of the collection and disbursal of leads
5. Netquote's computer system relating to the collection and disbursal of leads
6. Netquote's credit programs
7. Netquote's communications with Melissa Buschacher
8. Familiarity with Netquote's reputation
9. Knowledge of alleged false leads, the identity of and communication with the recipients thereof
10. Internal communications relating to the false leads alleged to have caused harm to Netquote
11. Internal communications and processes related to the receipt of bad leads
12. Internal communications related to leads that were subsequently discovered to be submissions from Brandon Byrd
13. Efforts made to intercept and identify the submissions by Brandon Byrd
14. Netquote's historical general financial information
15. Netquote's historical lead generation and disbursal data
16. Data concerning Netquote's lead quality
17. Identity of former and current Netquote employees
18. Information related to the quality of Mostchoice leads
19. Information related to the quality of Netquote leads

20. Netquote's National account relations
21. Netquote's Sales staff policy
22. Netquote's knowledge of the insurance lead generation industry
23. Discussions with representatives of bankrate
24. Netquote's communications with third parties about this lawsuit
25. Netquote's communications with third parties about Mostchoice
26. Netquote's communications with Mostchoice
27. Netquote's Cost of lead generation
28. Netquote's Cost of lead disbursal
29. Netquote's Cost of creating filtering systems
30. Netquote's Cost of customer acquisitions
31. Netquote's Customer retention
32. Netquote's Customer Service
33. Plaintiff's claims for damages
34. Documents produced by plaintiff in response to discovery
35. Netquote's business model
36. Netquote's website, website management, and website content
37. Netquote's internet protocol addresses

Dated this 21<sup>ST</sup> day of September, 2007.

**s/ Ryan Isenberg**

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 21, 2007, I served the foregoing Notice of Deposition by electronic delivery, as an attachment to an email, to the following counsel of record:

David W. Stark  
Daniel D. Williams  
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**s/ Ryan Isenberg**