

EXHIBIT G

**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.)	

**LEADER TECHNOLOGIES, INC.’S RESPONSES TO FACEBOOK, INC.’S SIXTH SET
OF INTERROGATORIES (NOS. 22-35)**

Pursuant to Fed. R. Civ. P. 33, Plaintiff Leader Technologies, Inc. (“Leader”) hereby submits the following objects and responds to Defendant Facebook, Inc.’s (“Facebook”) Sixth Set of Interrogatories (Nos. 22-35) (collectively the “Interrogatories”). Leader makes these objections and responses herein (collectively the “Responses”) based solely on its current knowledge, understanding, and belief as to the facts and information available to it as of the date of the Responses. Additional discovery and investigation may lead to additions to, changes in, or modifications of these Responses. The Responses, therefore, are being given without prejudice to Leader’s right to supplement these Responses pursuant to Fed. R. Civ. P. 26(e), or to provide subsequently discovered information and to introduce such subsequently discovered information at the time of any trial or proceeding in this action.

PRELIMINARY STATEMENTS

The specific Responses set forth below are for the purposes of discovery only and Leader neither waives nor intends to waive, but expressly reserves, any and all objections it may have to the relevance, competence, materiality, admissibility or use at trial of any information, documents or writings produced, identified or referred to herein, or to the introduction of any

evidence at trial relating to the subjects covered by such Responses. All such objections may be made at any time up to and including the time of trial.

A. Leader's investigation is ongoing. Pursuant to Fed. R. Civ. P. 26(e), Leader specifically reserves the right to supplement and amend these Responses and, if necessary, to assert additional objections arising from further investigation.

B. Leader expressly reserves its right to rely, at any time including trial, upon subsequently discovered information or information omitted from the specific Responses set forth below as a result of mistake, oversight or inadvertence.

C. The specific responses set forth below are based upon Leader's interpretation of the language used in the Interrogatories, and Leader reserves its right to amend or supplement further Responses in the event that Facebook asserts an interpretation that differs from Leader's interpretation.

D. Leader's response to a particular Interrogatory shall not be interpreted as implying that responsive documents and things exist or that Leader acknowledges the appropriateness of the Interrogatory.

E. The following Responses are based on information reasonably available to Leader as of the date of these Responses. Leader's investigation is continuing and ongoing and Leader expressly reserves the right to revise and/or supplement its Responses.

GENERAL OBJECTIONS

The following General Objections apply to each request and are hereby incorporated by reference into the individual response to each request, and shall have the same force and effect as if fully set forth in the individual Response to each Interrogatory.

1. Leader objects to each Interrogatory to the extent it purports to require Leader to do anything beyond what is required by the Federal Rules of Civil Procedure, the Local Rules of this Court, and other applicable law.

2. Leader objects to Facebook's "Instructions" to the extent they seek to impose obligations beyond those permitted by the Federal Rules of Civil Procedure, the Local Rules of this Court, or other applicable law.

3. Leader objects to each Interrogatory to the extent it seeks information protected by the attorney-client privilege, the attorney work-product doctrine, and/or any other applicable privilege or immunity.

4. Leader objects to each Interrogatory to the extent it is phrased in a manner that would render it overly broad, vague or ambiguous, or would require subjective judgment or speculation on the part of Leader. Leader responds to these Interrogatory by construing them in light of the scope of the issues in this action.

5. Leader objects to each Interrogatory to the extent it seeks to elicit information that is subject to a right of privacy under the relevant provisions of federal and state law.

6. Leader objects to each Interrogatory to the extent it seeks to elicit third-party confidential information.

7. Leader objects to each Interrogatory to the extent it purports to place an obligation on Leader to obtain information that is as readily available to Facebook as it is to Leader.

8. Leader objects to each Interrogatory to the extent it calls for information not in the possession, custody or control of Leader.

9. Leader objects to each Interrogatory to the extent it is not properly limited in time and/or improperly attempts to capture information, if any, created prior to issuance of U.S. Patent No. 7,139,761 (“the ‘761 Patent”).

10. Leader objects to each Interrogatory to the extent it calls for expert testimony.

11. Leader objects to each Interrogatory to the extent it calls for interpretation and application of legal conclusions and contentions of the parties.

OBJECTIONS TO DEFINITIONS

A. Leader objects to Facebook’s definitions of “Document” and “Communication” to the extent they seeks to define the terms more broadly than allowed under the Federal Rules of Civil Procedure and/or the Federal Rules of Evidence. Leader shall construe the terms in a manner consistent with said Rules.

B. Leader objects to Defendants definition of “LTI,” “Plaintiff” and “you” as overly broad. Leader shall construe the terms to mean Leader Technologies, Inc., and their employees, agents and attorneys.

LEADER TECHNOLOGIES, INC.’S RESPONSES AND SPECIFIC OBJECTIONS TO FACEBOOK, INC.’S SIXTH SET OF INTERROGATORIES (NOS. 22-35)

INTERROGATORY NO. 22:

Identify all documents created since December 10, 2002 reflecting any analysis, assessment or conclusions relating to the ‘761 patent. You may exclude any documents prepared by litigation counsel for LTI from your response.

RESPONSE TO INTERROGATORY NO. 22:

Leader objects to this Interrogatory to the extent it is vague and ambiguous, particularly as to the terms “reflecting,” “analysis,” “assessment” and “conclusions.” Leader objects to this

Interrogatory to the extent it seeks information which is outside the possession, custody or control of Leader. Leader objects to this Interrogatory to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable law, privilege, doctrine or immunity.

To the extent Leader understands this Interrogatory, subject to and without waiving the foregoing General and Specific Objections, Leader responds as follows: to the extent non-privileged documents responsive to this Interrogatory exist, they have been produced pursuant to Rule 33(d) of the Federal Rules of Civil Procedure. Privileged documents responsive to this Interrogatory may be found on Leader's privilege log.

INTERROGATORY NO. 23:

For each document identified in response to Interrogatory No. 22, identify each person to whom such document was provided, delivered, shown or described (collectively, "delivery") and the circumstances of such delivery, including, but not limited to, the date the document was delivered, the purpose(s) of such delivery, and the details of any response to such delivery (including the identification of any documents provided in response).

RESPONSE TO INTERROGATORY NO. 23:

Leader objects to this Interrogatory to the extent it is vague and ambiguous, particularly as to the terms "provided, delivered, shown or described." Leader objects to this Interrogatory to the extent it seeks information which is outside the possession, custody or control of Leader. Leader objects to this Interrogatory to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable law, privilege, doctrine or

immunity. Leader objects to this Interrogatory to the extent that it is compound amounting to multiple separate interrogatories because it is comprised of multiple discrete subparts.

To the extent Leader understands this Interrogatory, subject to and without waiving the foregoing General and Specific Objections, Leader responds as follows: to the extent non-privileged documents responsive to Interrogatory No. 22 exist, they have been produced and their recipients can be ascertained from Leader's production pursuant to Rule 33(d) of the Federal Rules of Civil Procedure. The recipients, if any, of privileged documents responsive to this Interrogatory may be found on Leader's privilege log.

INTERROGATORY NO. 24:

For each person with whom LTI, Michael McKibben and/or anyone acting on LTI's or Mr. McKibben's behalf communicated regarding funding for litigation involving the '761 patent, identify each communication and describe with particularity the circumstances of such communication including, but not limited to, the substance of the communication, all documents(s) provided during the course of such communication(s) including the identity of any documents identified in response to Interrogatory No. 22), the details of any response to such communication (including the identification of any documents provided in response), and whether or not funding was provided and the reason for such decision.

RESPONSE TO INTERROGATORY NO. 24:

Leader objects to this Interrogatory as overbroad and unduly burdensome to the extent it seeks information that is not relevant to any party's claim or defense in the Action and/or not reasonably calculated to lead to the discovery of admissible evidence. Leader objects to this Interrogatory to the extent it is vague and ambiguous. Leader objects to this Interrogatory to the

extent it seeks information which is outside the possession, custody or control of Leader. Leader objects to this Interrogatory to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable law, privilege, doctrine or immunity. Leader objects to this Interrogatory to the extent that it is compound amounting to multiple separate interrogatories because it is comprised of multiple discrete subparts.

Subject to and without waiving the foregoing Specific and General Objections, Leader responds as follows: pursuant to the Court's Order on November 13, 2009 during the hearing with Magistrate Judge Stark and Rule 33(d) of the Federal Rules of Civil Procedure, Leader will produce all non-disclosure agreements and community of interest agreements related to this Action and entered into between Leader and any individual and/or entity regarding the possibility of investing in or financing the costs of the present Action. These documents can be found at LTI146049 - LTI146055 and LTI146072 - LTI146125.

INTERROGATORY NO. 25:

Identify all documents upon which LTI bases its assertion, if any, that it had and/or has a reasonable belief that Leader2Leader was properly marked, including any analyses of the '761 patent or Leader2Leader.

RESPONSE TO INTERROGATORY NO. 25:

Leader objects to this Interrogatory as overbroad and unduly burdensome to the extent it seeks information that is not relevant to any party's claim or defense in the Action and/or not reasonably calculated to lead to the discovery of admissible evidence. Leader objects to this Interrogatory to the extent it is vague and ambiguous, particularly as to the terms "reasonable belief" and "properly marked." Leader objects to this Interrogatory to the extent it seeks

information which is outside the possession, custody or control of Leader. Leader objects to this Interrogatory to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable law, privilege, doctrine or immunity.

To the extent Leader understands this Interrogatory, subject to and without waiving the foregoing General and Specific Objections, Leader responds as follows: to the extent non-privileged documents responsive to this Interrogatory exist, they have been produced pursuant to Rule 33(d) of the Federal Rules of Civil Procedure. Leader relied on at least U.S. Patent No. 7,139,761, which can be found at LTI000001-31.

INTERROGATORY NO. 26:

For each document identified in response to Interrogatory No. 25, identify each person to whom such document was provided and the circumstances of such delivery, including, but not limited to, the date the document was delivered and the purpose(s) of such delivery.

RESPONSE TO INTERROGATORY NO. 26:

Leader objects to this Interrogatory to the extent it is vague and ambiguous, particularly as to the terms "provided" and "delivery." Leader objects to this Interrogatory as overbroad and unduly burdensome to the extent it seeks information that is not relevant to any party's claim or defense in the Action and/or not reasonably calculated to lead to the discovery of admissible evidence. Leader objects to this Interrogatory to the extent it seeks information which is outside the possession, custody or control of Leader. Leader objects to this Interrogatory to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable law, privilege, doctrine or immunity.

Subject to and without waiving the foregoing General and Specific Objections, Leader responds as follows: the '761 patent is a public document and Leader has no knowledge of each person who has been provided the patent. At least some of the recipients of the '761 patent can be ascertained from Leader's document production pursuant to Federal Rule of Civil Procedure 33(d).

INTERROGATORY NO. 27:

For each prior art reference identified in the Request for *Ex Parte* Reexamination of the U.S. Patent No. 7,139,761 filed on July 2, 2009, if you contend the prior art reference fails to disclose any element(s) of any asserted claim of the '761 patent, identify with particularity all allegedly missing element(s) and explain in detail the complete factual basis for your contention that the prior art reference allegedly fails to disclose those element(s).

RESPONSE TO INTERROGATORY NO. 27:

Leader objects to this Interrogatory to the extent it requires a legal interpretation or conclusion to which no response is required. Leader objects to this Interrogatory to the extent it is vague and ambiguous, particularly as to the terms "prior art reference," "missing element(s)" and "fails to disclose." Leader objects to this Interrogatory to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable law, privilege, doctrine or immunity.

Subject to and without waiving the foregoing General and Specific Objections, Leader responds as follows: under 35 U.S.C. § 282, the '761 patent is presumed valid. Facebook has not provided adequate basis under which any of the references identified in the Request of *Ex Parte* Reexamination would render the '761 patent invalid.

INTERROGATORY NO. 28:

For each prior art reference identified in Facebook, Inc.'s Objections and Responses to Plaintiff Leader Technologies, Inc.'s Fourth Set of Interrogatories, if you contend the prior art reference fails to disclose any element(s) of any asserted claim of the '761 patent, identify with particularity all allegedly missing element(s) and explain in detail the complete factual basis for your contention that the prior art reference allegedly fails to disclose those element(s).

RESPONSE TO INTERROGATORY NO. 28:

Leader objects to this Interrogatory to the extent it requires a legal interpretation or conclusion to which no response is required. Leader objects to this Interrogatory to the extent it is vague and ambiguous, particularly as to the terms "prior art reference," "missing element(s)" and "fails to disclose." Leader objects to this Interrogatory to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable law, privilege, doctrine or immunity.

Subject to and without waiving the foregoing General and Specific Objections, Leader responds as follows: under 35 U.S.C. § 282, the '761 patent is presumed valid. Facebook has not provided adequate basis under which any of the references identified in Facebook, Inc.'s Objections and Responses to Plaintiff Leader Technologies, Inc.'s Fourth Set of Interrogatories would render the '761 patent invalid.

INTERROGATORY NO. 29:

Identify all facts and evidence supporting your contention, if any, that the asserted claims of '761 patent are non-obvious due to secondary consideration of non-obviousness, including the

complete factual basis for such contention and all documents, witnesses and evidence supporting such contention.

RESPONSE TO INTERROGATORY NO. 29:

Leader objects to this Interrogatory to the extent it requires a legal interpretation or conclusion to which no response is required. Leader objects to this Interrogatory to the extent it is vague and ambiguous, particularly as to the term “supporting such contention.” Leader objects to this Interrogatory to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable law, privilege, doctrine or immunity. Leader objects to this Interrogatory to the extent it calls for expert testimony.

Subject to and without waiving the foregoing General and Specific Objections, Leader responds as follows: Leader contends that the ‘761 patent is valid and not obvious. There is significant evidence of commercial success, long-felt but unsolved need, failure of others, teaching away, copying, and industry acclaim.

Copying and commercial success of the invention of the ‘761 patent is demonstrated by Facebook’s copying of the invention, and Facebook’s subsequent success. No later than 1999, Leader conceived the invention claimed in the ‘761 patent. No later than 2002, Leader had reduced the invention of the ‘761 patent to practice. Leader described its invention in a series of white papers. Facebook launched the Facebook Website after the white papers were published and using the invention claimed in the ‘761 Patent. Since then, the online collaboration industry has shifted toward utilizing the same technology. As a result of Facebook’s copying, the Facebook Website has gone through rapid growth and now has the most users of any social networking website in the United States. The Facebook Website is also one of the top 10 most visited websites in the United States. Facebook’s apparent copying of the invention of the ‘761

patent and subsequent success demonstrate copying and commercial success of the invention claimed in the '761 patent.

There was long-felt unresolved need in the industry for the invention claimed in the '761 patent because previously available collaboration tools were insufficient for widespread online collaboration. The prior art methods of data management demonstrate others failed in creating a tool that could effectively manage an ever-increasing amount of data used by an ever-increasing number of users. The invention claimed in the '761 patent breaks from this failure by creating a system which allows the leveraging of context information and metadata to provide increased efficiency in online collaboration. Thus, prior to the invention claimed in the '761 Patent, there was a long-felt but unresolved need for an online tool for effectively managing the ever-increasing amount of data and number of users. Further evidence of the long felt need is described in the documents labeled LTI000001-31 and LTI022154-62.

Prior art methods of online collaboration taught away from the invention claimed in the '761 Patent. This is because among other things prior art tools did not leverage context metadata to provide online collaboration effectively for an ever-increasing number of users and amount of data.

Facebook's copying of the invention claimed in the '761 Patent has enabled it to win numerous industry awards. For example TechCrunch, a leading technology news organization, awarded Facebook the Best Overall Technology Innovation in the last two years.

INTERROGATORY NO. 30:

Identify with particularity the person having ordinary skill in the art for purposes of the '761 patent, including but not limited to the education, training and experience of such a person.

RESPONSE TO INTERROGATORY NO. 30:

Leader objects to this Interrogatory to the extent it requires a legal interpretation or conclusion to which no response is required. Leader objects to this Interrogatory to the extent it is vague and ambiguous. Leader objects to this Interrogatory to the extent it is vague and ambiguous.

Subject to and without waiving the foregoing General and Specific Objections, Leader responds as follows: a person of ordinary skill in the art would be someone with a bachelor's degree or higher in computer science and/or several years of experience in the computer industry.

INTERROGATORY NO. 31:

For any element of any asserted claim of '761 patent that you contend is not literally present or literally practiced by any accused Facebook system or method but is allegedly present or practiced under the doctrine of equivalents, identify such element and state all facts supporting such contention.

RESPONSE TO INTERROGATORY NO. 31:

Leader objects to this Interrogatory to the extent it requires a legal interpretation or conclusion to which no response is required. Leader objects to this Interrogatory to the extent it is vague and ambiguous, particularly as to the terms "present" and "practiced." Leader objects to this Interrogatory to the extent that it is premature, as the Court has not yet construed claim terms of the '761 Patent.

Subject to and without waiving the foregoing General and Specific Objections, Leader responds as follows: Leader contends that all asserted claims of the '761 patent are literally

infringed. In the alternative, Leader contends that all asserted claims of the '761 patent are infringed under the doctrine of equivalents.

INTERROGATORY NO. 32:

For each Request for Admission in Facebook's Second Set of Requests for Admission (21-25) that LTI has denied or otherwise not admitted, describe in detail each and every basis for the denial or response.

RESPONSE TO INTERROGATORY NO. 32:

Leader objects to this Interrogatory to the extent it requires a legal interpretation or conclusion to which no response is required. Leader objects to this Interrogatory as overbroad and unduly burdensome to the extent it seeks information that is not relevant to any party's claim or defense in the Action and/or not reasonably calculated to lead to the discovery of admissible evidence. Leader objects to this Interrogatory to the extent it is vague and ambiguous. Leader objects to this Interrogatory to the extent that it is premature, as the Court has not yet construed claim terms of the '761 Patent.

The basis for denial of Facebook's request for admission Nos. 21-22 are based on information of Leader's products and the '761 patent.

The basis for denial of Facebook's request for admission Nos. 23 is because Leader had and has a reasonable belief that the Leader2Leader was properly marked.

The basis for denial of Facebook's request for admission 24 is because Leader and Facebook offer competing products and/or services.

The basis for denial of Facebook's request for admission 25 is because Leader's product, Leader2Leader® powered by the Digital Leaderboard® engine, includes a "computer-

implemented tracking component . . . for tracking the change of the user from the first context to a second context . . . and dynamically updating the stored metadata based on the change.”

INTERROGATORY NO. 33:

Describe in detail the search methodology used by LTI in preparing documents for production in this Action, including all sources of documents searched, all search terms used, and the identity of the person who were and are the custodian of the documents for each source of documents.

RESPONSE TO INTERROGATORY NO. 33:

Leader objects to this Interrogatory as overbroad and unduly burdensome to the extent it seeks information that is not relevant to any party’s claim or defense in the Action and/or not reasonably calculated to lead to the discovery of admissible evidence. Leader objects to this Interrogatory to the extent it is vague and ambiguous, particularly as to the phrases “search methodology,” “preparing documents for production” and “who were and are the custodians of the documents for each source of documents.”

Subject to and without waiving the foregoing General and Specific Objections, Leader responds as follows: Leader searched all paper and electronic documents in its custody and control. Leader reviewed all data files located on the computers of all current Leader employees as well as all the files on Leader’s backup server. Leader also searched the contents of all current and archived Leader emails to or from all Leader employees that were in its custody and control. The search terms used for electronic searching included, but were not limited to, “Patent?,” “7,139,761,” “7139761,” “761,” “10/732,744,” “10/732744,” “744,” “context,” “?board?,” “track?,” “Leader Phone,” “LeaderPhone,” “Leader Dialog,” “LeaderDialog,”

“Leader Alert,” “LeaderAlert,” “Leader Meeting,” “LeaderMeeting,” “Digital Leaderboard,” “Leader Board,” “Leaderboard,” “Leader2Leader,” “Leadership Software” and “Facebook.”

INTERROGATORY NO. 34:

Describe in detail LTI’s marketing plans or programs, including but not limited to how LTI markets its products and services to anyone.

RESPONSE TO INTERROGATORY NO. 34:

Leader objects to this Interrogatory as overbroad and unduly burdensome to the extent it seeks information that is not relevant to any party’s claim or defense in the Action and/or not reasonably calculated to lead to the discovery of admissible evidence. Leader objects to this Interrogatory to the extent it is vague and ambiguous, particularly as to the phrase “marketing plans or programs.” Leader objects to this Interrogatory to the extent it seeks information which is outside the possession, custody or control of Leader.

Subject to and without waiving the foregoing General and Specific Objections, Leader responds as follows: Leader markets its products through a dedicated sales force of Leader employees and a network of sales affiliates. Leader generally markets its products through identifying and contacting organizations likely to require or benefit from the products Leader offers, personal contacts at organizations, responding to requests for proposal from government and/or commercial sources, word of mouth and participating in trade shows.

Leader provides potential customers marketing documents outlining the functionality of the Leader products and/or services. Representative examples of Leader marketing documents may be found at the documents labeled LTI022154-62, LTI071306, LTI074260, LTI074992, LTI097186-92, and LTI103232.

INTERROGATORY NO. 35:

Describe in detail any investments made in LTI, Leader2Leader or the '761 patent by third parties, including the date of the investment, the type of the investment, the amount of the investment, identity of the third party, and any agreement made with the third party for the investment.

RESPONSE TO INTERROGATORY NO. 35:

Leader objects to this Interrogatory as overbroad and unduly burdensome to the extent it seeks information that is not relevant to any party's claim or defense in the Action and/or not reasonably calculated to lead to the discovery of admissible evidence. Leader objects to this Interrogatory to the extent it is vague and ambiguous. Leader objects to this Interrogatory to the extent it seeks information which is outside the possession, custody or control of Leader. Leader objects to this Interrogatory to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable law, privilege, doctrine or immunity.

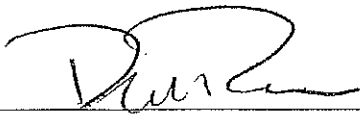
Subject to and without waiving the foregoing Specific and General Objections, Leader responds as follows: pursuant to the Court's Order on November 13, 2009 during the hearing with Magistrate Judge Stark and Rule 33(d) of the Federal Rules of Civil Procedure, Leader will produce all non-disclosure agreements and community of interest agreements related to this Action and entered into between Leader and any individual and/or entity regarding the possibility of investing in or financing the costs of the present Action. These documents can be found at LTI146049 - LTI146055 and LTI146072 - LTI146125.

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Dated: November 20, 2009
943347

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Leader Technologies, Inc.*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on November 20, 2009, true and correct copies of the within document were served on the following counsel of record, at the addresses and in the manner indicated:

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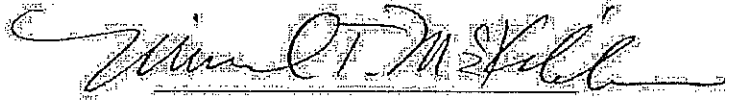


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VERIFICATION

I, Michael T. McKibben, Chairman and Founder of Leader Technologies, Inc., being duly sworn, deposes and says that I am authorized to sign this Verification and that I am informed and believe that the factual statements in Plaintiff Leader Technologies, Inc.'s Responses to Facebook, Inc.'s Sixth Set of Interrogatories are true and correct to the best of my knowledge, information and belief. I declare under penalty of perjury under the laws of the State of Ohio and the United States that the above statement is true and correct.

Nov. 20, 2009



Date

Michael T. McKibben

EXHIBIT H

**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.)	

**LEADER TECHNOLOGIES, INC.’S RESPONSES TO FACEBOOK, INC.’S
FOURTH SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO
LEADER TECHNOLOGIES, INC. (NOS. 86-91)**

Pursuant to Fed. R. Civ. P. 34, Leader Technologies, Inc. (“Leader”) hereby objects and responds to Defendant Facebook, Inc.’s (“Facebook”) Fourth Set of Requests for Production of Documents to Leader Technologies, Inc. (Nos. 86-91) (“Requests”). Leader makes the objections and responses herein (collectively the “Responses”) based solely on its current knowledge, understanding and belief as to the facts and information available to it as of the date of the Responses. Additional discovery and investigation may lead to additions to or modifications of these Responses. The Responses, therefore, are being given without prejudice to Leader’s right to supplement these Responses pursuant to Fed. R. Civ. P. 26(e), or to produce subsequently discovered information and to introduce such subsequently discovered information at the time of any trial or other proceedings in this action.

GENERAL OBJECTIONS

1. Leader hereby incorporates by reference each and every general objection set forth below into each and every specific Response. From time to time, a specific Response may repeat a general objection for emphasis or for some other reason. The failure to include a general

objection in a specific Response shall not be interpreted as a waiver of that general objection to that Response.

2. Leader objects to each and every Definition, Instruction, and Request to the extent it purports to impose any requirement or discovery obligation on Leader greater or different than those imposed by the Federal Rules of Civil Procedures, the Local Civil Rules of this Court, or orders of the Court governing these proceedings.

3. By stating in these Responses that Leader will produce documents or things, Leader does not intend to represent that any responsive documents or things actually exist within its possession, custody, or control, but rather that Leader has made, and will continue to make, a reasonable good faith search and attempt to ascertain whether responsive documents or things do in fact exist in Leader's possession, custody, or control.

4. Leader's production of documents or things in response to any Request is not intended to waive, and does not constitute waiver of, any objection which it may have to the admissibility, authenticity, competency, relevance, or materiality of the documents and things produced. For any and all documents and things produced in response to each Request, Leader reserves all objections or other questions regarding the admissibility, authenticity, competency, relevance, or materiality of such documents and things as evidence in this suit or any other proceeding, action, or trial.

5. Leader objects to each and every Definition, Instruction, and Request to the extent it purports to require Leader to produce documents or things that are not within its possession, custody, or control. Leader limits the scope of its Response to each Request to information within its possession, custody, or control.

6. Leader objects to each and every Definition, Instruction, and Request to the extent it seeks the production of “all” documents, communications and/or things in circumstances where literal interpretation of the Request asks for documents and things that are not relevant to the Litigation and renders the Request overly broad, unduly burdensome, and oppressive. In such circumstances, subject to any other applicable objection, Leader will make a reasonable production of responsive, non-privileged documents relevant to any claim or defense of the parties in the Litigation.

7. Leader objects to each and every Definition, Instruction, and Request to the extent that it seeks information that is in the public domain and is either (a) equally available to Facebook from another source; or (b) can be obtained more efficiently by Facebook through other means of discovery.

8. Leader objects to each and every Definition, Instruction, and Request to the extent it calls a legal conclusion or for information which is subject to a claim of privilege, including, without limitation, the attorney-client privilege and/or attorney-work product doctrine, or any other applicable privilege, doctrine, or immunity. Leader will not disclose or produce any documents or things so protected and the inadvertent disclosure or production of any such information shall not constitute a waiver of any applicable privilege, doctrine, or immunity.

9. Leader objects to each and every Definition, Instruction, and Request to the extent that it seeks the production of confidential, business, financial, proprietary, or sensitive information or trade secrets of Leader before the Court has entered an acceptable protective order in the Litigation.

10. Leader objects to each and every Definition, Instruction, and Request to the extent that it seeks the production of confidential, business, financial, proprietary, or sensitive

information or trade secrets of third parties that is subject to a pre-existing protective order and/or confidentiality agreement or in which any third party has an expectation of privacy. Such information shall not be provided absent an express order from a court of competent jurisdiction or an authorization from the third party having the interest in the information's confidentiality.

11. Leader objects to each and every Definition, Instruction, and Request to the extent it seeks the production of documents or things containing both discoverable and non-discoverable or objectionable material and reserves the right to redact from documents or things any non-responsive or irrelevant matter and matter for which Leader may claim privilege or immunity from discovery.

12. Leader objects to each and every Definition, Instruction, and Request to the extent it is overbroad and/or seeks information that is not relevant to the issues in the Litigation or not reasonably calculated to lead to the discovery of admissible evidence because it is not properly limited in time.

13. Leader objects to each and every Definition, Instruction, and Request to the extent it is unreasonably cumulative or duplicative.

14. Leader objects to each and every Definition, Instruction, and Request to the extent it is premature because the Court has not yet construed the claim terms of U.S. Patent No. 7,139,761 ("the '761 Patent") and/or it seeks documents or information that are scheduled to be disclosed to Facebook on future dates directed by the Court.

15. Leader objects to each and every Definition, Instruction, and Request to the extent that it is vague and ambiguous.

16. Leader objects to each and every Definition, Instruction, and Request to the extent it is unduly burdensome and oppressive to the extent it subjects Leader to unreasonable and undue effort or expense.

17. Leader's written Responses and production of documents and things are based upon information and writings available to and located by its attorneys as of the date of these Responses. Leader has not completed its investigation of the facts relating to this case, has not completed discovery in this action, and has not completed its preparation for trial. The information supplied herein is based only on such information and documents which are reasonably available and specifically known to Leader and its attorneys as of the date of these Responses. Therefore, Leader's written Responses and production of documents and things are made without prejudice to Leader's right to supplement and/or amend the written Responses and the production of documents and things and to present at any trial or other proceeding evidence discovered and produced hereafter.

18. Leader objects to each and every Definition, Instruction, and Request to the extent it is unduly burdensome and oppressive on the grounds that it purports to require Leader to search facilities other than those facilities that would reasonably be expected to have responsive information. Leader's Responses are based upon a reasonable search of facilities and files that could reasonably be expected to contain responsive information.

OBJECTIONS TO DEFINITIONS

A. Leader objects to Facebook's definition of "LTI," "Plaintiff," and "you," as overly broad. Leader shall construe the terms to mean Leader Technologies, Inc., and their employees, agents and attorneys.

B. Leader objects to Facebook's definitions of "Document" and "Communication" to the extent they seeks to define the terms more broadly than allowed under the Federal Rules of Civil Procedure and/or the Federal Rules of Evidence. Leader shall construe the terms in a manner consistent with said Rules.

DEFINITIONS

A. Litigation means the action commenced in the U.S. District Court for the District of Delaware (C.A. No. 08-cv-00862-JJF-LPS).

RESPONSES AND SPECIFIC OBJECTIONS TO REQUESTS

REQUEST FOR PRODUCTION NO. 86:

All documents created since December 10, 2002 reflecting any analysis, assessment or conclusions relating to the '761 patent. You may exclude any documents prepared by litigation counsel for LTI from your response.

RESPONSE TO REQUEST FOR PRODUCTION NO. 86:

Leader objects to this Request to the extent it is vague and ambiguous, particularly as to the terms "analysis," "assessment," "conclusions" and "litigation counsel." Leader objects to this Request as overbroad and unduly burdensome to the extent it seeks information that is not relevant to any party's claim or defense in the Litigation and/or not reasonably calculated to lead to the discovery of admissible evidence. Leader objects to this Request to the extent it seeks information which is outside the possession, custody or control of Leader. Leader objects to this Request to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable law, privilege, doctrine or immunity.

Subject to and without waiving the foregoing General and Specific Objections, Leader responds as follows: to the extent Leader understands this Request and such documents exist,

Leader has produced all responsive non-privileged documents located after a reasonable search of documents in Leader's custody and control.

REQUEST FOR PRODUCTION NO. 87:

All documents and communications received in response to provision, delivery, display or description (collectively, "delivery") to any person of any analysis, assessment or conclusions relating to the '761 patent.

RESPONSE TO REQUEST FOR PRODUCTION NO. 87:

Leader objects to this Request as overbroad and unduly burdensome to the extent it seeks information that is not relevant to any party's claim or defense in the Litigation and/or not reasonably calculated to lead to the discovery of admissible evidence. Leader objects to this Request as unintelligible. Leader objects to this Request to the extent it is vague and ambiguous, particularly as to the terms "provision," "delivery," "display," "analysis," "assessment" and "conclusions." Leader objects to this Request to the extent it seeks information which is outside the possession, custody or control of Leader. Leader objects to this Request to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable law, privilege, doctrine or immunity.

Subject to and without waiving the foregoing General and Specific Objections, Leader responds as follows: to the extent Leader understands this Request and such documents exist, Leader has produced all responsive non-privileged documents located after a reasonable search of documents in Leader's custody and control.

REQUEST FOR PRODUCTION NO. 88:

All communications and related documents referring to, relating to or regarding funding for litigation involving the '761 patent.

RESPONSE TO REQUEST FOR PRODUCTION NO. 88:

Leader objects to this Request as overbroad and unduly burdensome to the extent it seeks information that is not relevant to any party's claim or defense in the Litigation and/or not reasonably calculated to lead to the discovery of admissible evidence. Leader objects to this Request to the extent it is vague and ambiguous, particularly as to the term "regarding." Leader objects to this Request to the extent it seeks information which is outside the possession, custody or control of Leader. Leader objects to this Request to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable law, privilege, doctrine or immunity.

Subject to and without waiving the foregoing General and Specific Objections, Leader responds as follows: pursuant to the Court's Order on November 13, 2009 during the hearing with Magistrate Judge Stark, Leader will produce all non-disclosure agreements and community of interest agreements related to this Litigation and entered into between Leader and any individual and/or entity regarding the possibility of investing in or financing the costs of the present Litigation.

REQUEST FOR PRODUCTION NO. 89:

All communications and related documents received in response to any communication from LTI, Michael McKibben and/or anyone acting on LTI's or Mr. McKibben's behalf referring to, relating to or regarding funding for litigation involving the '761 patent.

RESPONSE TO REQUEST FOR PRODUCTION NO. 89:

Leader objects to this Request as overbroad and unduly burdensome to the extent it seeks information that is not relevant to any party's claim or defense in the Litigation and/or not reasonably calculated to lead to the discovery of admissible evidence. Leader objects to this Request to the extent it is vague and ambiguous, particularly as to the terms "related documents," "regarding" and "involving the '761 patent." Leader objects to this Request to the extent it seeks information which is outside the possession, custody or control of Leader. Leader objects to this Request to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable law, privilege, doctrine or immunity.

Subject to and without waiving the foregoing General and Specific Objections, Leader responds as follows: pursuant to the Court's Order on November 13, 2009 during the hearing with Magistrate Judge Stark, Leader will produce all non-disclosure agreements and community of interest agreements related to this Litigation and entered into between Leader and any individual and/or entity regarding the possibility of investing in or financing the costs of the present Litigation.

REQUEST FOR PRODUCTION NO. 90:

All documents upon which LTI bases its assertion, if any, that it had and/or has a reasonable belief that Leader2Leader was properly marked, including and analyses of the '761 patent or Leader2Leader.

RESPONSE TO REQUEST FOR PRODUCTION NO. 90:

Leader objects to this Request to the extent it is vague and ambiguous, particularly as to the terms "reasonable belief" and "properly marked." Leader objects to this Request as overbroad and unduly burdensome to the extent it seeks information that is not relevant to any

party's claim or defense in the Litigation and/or not reasonably calculated to lead to the discovery of admissible evidence. Leader objects to this Request to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable law, privilege, doctrine or immunity.

Subject to and without waiving the foregoing General and Specific objections, Responding Party responds as follows: to the extent Leader understands this Request and such documents exist, Leader has produced responsive non-privileged documents located after a reasonable search of documents in its custody and control that are relevant to this Litigation.

REQUEST FOR PRODUCTION NO. 91:

All documents and communications that constitutes the "hard evidence of willful infringement" to which Michael McKibben refers in the document labeled LTI078263.

RESPONSE TO REQUEST FOR PRODUCTION NO. 91:

Leader objects to this request to the extent it seeks to burden Leader with the production of publicly documents and/or documents within the possession, custody or control of Facebook. Leader objects to this Request to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable law, privilege, doctrine or immunity.

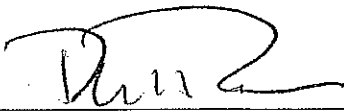
Subject to and without waiving the foregoing General and Specific objections, Responding Party responds as follows: to the extent Leader understands this Request and such documents exist, Leader has produced responsive non-privileged documents located after a reasonable search of documents in its custody and control that are relevant to this Litigation.

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Dated: November 20, 2009
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CERTIFICATE OF SERVICE

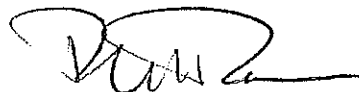
I, Philip A. Rovner, hereby certify that on November 20, 2009, true and correct copies of the within document were served on the following counsel of record, at the addresses and in the manner indicated:

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EXHIBIT I

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

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

**LEADER TECHNOLOGIES, INC.'S FIRST SUPPLEMENTAL RESPONSES
TO FACEBOOK, INC.'S SEVENTH SET OF INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 33 and 26(e), Plaintiff Leader Technologies, Inc. ("Leader") hereby submits the following First Supplemental Responses to Defendant Facebook, Inc.'s ("Facebook") Seventh Set of Interrogatories ("Interrogatories"). Leader expressly incorporates by reference its original response and each and every general and specific objection to these Interrogatories ("Responses").

Leader makes these supplemental responses herein ("Supplemental Responses") based solely on its current knowledge, understanding, and belief as to the facts and information available to it as of the date of the Supplemental Responses. Additional discovery and investigation may lead to additions to, changes in, or modifications of these Supplemental Responses. The Supplemental Responses, therefore, are being given without prejudice to Leader's right to supplement these Supplemental Responses pursuant to Federal Rule of Civil Procedure 26(e), or to provide subsequently discovered information and to introduce such subsequently discovered information at the time of any trial or proceeding in this action.

SUPPLEMENTAL RESPONSES

INTERROGATORY NO. 36:

Identify and describe with particularity each instance in which LTI has marked any product and/or service with U.S. Patent No. 7139,761 B1 or the application or provisional application for such patent (including marking with "Patent Pending" or any other similar designation), including without limitation the identity of the product and/or service marked; the actual mark affixed to such product and/or service; each location where such mark appeared, including but not limited to every document, communication, web page URL, software screen, splash screen, user manual, and piece of marketing material; and all date(s) when such mark(s) appeared.

ORIGINAL RESPONSE TO INTERROGATORY NO. 36:

Leader objects to this Interrogatory as overbroad and unduly burdensome to the extent it seeks information that is not relevant to any party's claim or defense in the Action and/or not reasonably calculated to lead to the discovery of admissible evidence. Leader objects to this Interrogatory to the extent it calls for a legal conclusion. Leader objects to this Interrogatory to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable law, privilege, doctrine, or immunity. Leader objects to this Interrogatory to the extent that it is compound amounting to multiple separate interrogatories because it is comprised of discrete subparts. Leader objects to this Interrogatory to the extent that it is nonsensical, particularly as to the phrase "any efforts by LTI to marked any product." Leader objects to this Interrogatory to the extent that it is vague and ambiguous, particularly as to the terms "referring to," "relating to," "mentioning," "similar designation," "software screen," "splash screen," and "piece of marketing material."

Subject to and without waiving the foregoing general and specific objections, Leader responds as follows: products and or services marked with the '761 Patent or "Patent Pending" can be ascertained from Leader's document production pursuant to the Federal Rules of Civil Procedure 33(d).

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 36:

Leader incorporates by reference the General and Specific Objections and Response to this Interrogatory set forth in its earlier Responses.


Subject to and without waiving the forgoing Specific and General Objections, Leader responds as follows: Leader2Leader®, and any other products running on the Leader2Leader® platform or on the Digital Leaderboard® engine (e.g. LeaderPhone® and LeaderAlert®) were marked with U.S. Patent No. 7,139,761, starting when the patent issued on November 21, 2006. Representative examples of product and advertising material marked with U.S. Patent No. 7,139,761 or "Patent(s) Pending" are LTI_007693, LTI_015709-15, LTI_022154-62, LTI_070352-53, LTI_070420, LTI_070591-93, LTI_070597, LTI_071440-42, LTI_072257, LTI_072400-02, LTI074260, LTI076664, LTI077516, LTI083018-26, and LTI097186-92.

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Dated: April 8, 2010
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Leader Technologies, Inc.*

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

CERTIFICATE OF SERVICE

I, Jonathan A. Choa, hereby certify that on April 8, 2010, true and correct copies of the within document were served on the following counsel of record, at the addresses and in the manner indicated:

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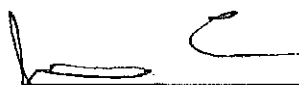

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EXHIBIT J

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

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

**LEADER TECHNOLOGIES, INC.'S RESPONSES TO FACEBOOK, INC.'S
FIFTH SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO
LEADER TECHNOLOGIES, INC. (RE: MARKING)**

Pursuant to Fed. R. Civ. P. 34, Plaintiff Leader Technologies, Inc. ("Leader") hereby objects and responds to Defendant Facebook, Inc.'s ("Facebook") Fifth Set of Requests for Production of Documents to Leader Technologies, Inc. ("Requests"). Leader makes the objections and responses herein (collectively the "Responses") based solely on its current knowledge, understanding and belief as to the facts and information available to it as of the date of the Responses. Additional discovery and investigation may lead to additions to or modifications of these Responses. The Responses, therefore, are being given without prejudice to Leader's right to supplement these Responses pursuant to Fed. R. Civ. P. 26(e), or to produce subsequently discovered information and to introduce such subsequently discovered information at the time of any trial or other proceedings in this action.

GENERAL OBJECTIONS

1. Leader hereby incorporates by reference each and every general objection set forth below into each and every specific Response. From time to time, a specific Response may repeat a general objection for emphasis or for some other reason. The failure to include a general

objection in a specific Response shall not be interpreted as a waiver of that general objection to that Response.

2. Leader objects to each and every Definition, Instruction, and Request to the extent it purports to impose any requirement or discovery obligation on Leader greater or different than those imposed by the Federal Rules of Civil Procedures, the Local Civil Rules of this Court, or orders of the Court governing these proceedings.

3. By stating in these Responses that Leader will produce documents or things, Leader does not intend to represent that any responsive documents or things actually exist within its possession, custody, or control, but rather that Leader has made, and will continue to make, a reasonable good faith search and attempt to ascertain whether responsive documents or things do in fact exist in Leader's possession, custody, or control.

4. Leader's production of documents or things in response to any Request is not intended to waive, and does not constitute waiver of, any objection which it may have to the admissibility, authenticity, competency, relevance, or materiality of the documents and things produced. For any and all documents and things produced in response to each Request, Leader reserves all objections or other questions regarding the admissibility, authenticity, competency, relevance, or materiality of such documents and things as evidence in this suit or any other proceeding, action, or trial.

5. Leader objects to each and every Definition, Instruction, and Request to the extent it purports to require Leader to produce documents or things that are not within its possession, custody, or control. Leader limits the scope of its Response to each Request to information within its possession, custody, or control.

6. Leader objects to each and every Definition, Instruction, and Request to the extent it seeks the production of "all" documents, communications and/or things in circumstances where literal interpretation of the Request asks for documents and things that are not relevant to the Litigation and renders the Request overly broad, unduly burdensome, and oppressive. In such circumstances, subject to any other applicable objection, Leader will make a reasonable production of responsive, non-privileged documents relevant to any claim or defense of the parties in the Litigation.

7. Leader objects to each and every Definition, Instruction, and Request to the extent that it seeks information that is in the public domain and is either (a) equally available to Facebook from another source; or (b) can be obtained more efficiently by Facebook through other means of discovery.

8. Leader objects to each and every Definition, Instruction, and Request to the extent it calls a legal conclusion or for information which is subject to a claim of privilege, including, without limitation, the attorney-client privilege and/or attorney-work product doctrine, or any other applicable privilege, doctrine, or immunity. Leader will not disclose or produce any documents or things so protected and the inadvertent disclosure or production of any such information shall not constitute a waiver of any applicable privilege, doctrine, or immunity.

9. Leader objects to each and every Definition, Instruction, and Request to the extent that it seeks the production of confidential, business, financial, proprietary, or sensitive information or trade secrets of third parties that is subject to a pre-existing protective order and/or confidentiality agreement or in which any third party has an expectation of privacy. Such information shall not be provided absent an express order from a court of competent jurisdiction or an authorization from the third party having the interest in the information's confidentiality.

10. Leader objects to each and every Definition, Instruction, and Request to the extent it seeks the production of documents or things containing both discoverable and non-discoverable or objectionable material and reserves the right to redact from documents or things any non-responsive or irrelevant matter and matter for which Leader may claim privilege or immunity from discovery.

11. Leader objects to each and every Definition, Instruction, and Request to the extent it is overbroad and/or seeks information that is not relevant to the issues in the Litigation or not reasonably calculated to lead to the discovery of admissible evidence because it is not properly limited in time.

12. Leader objects to each and every Definition, Instruction, and Request to the extent it is unreasonably cumulative or duplicative.

13. Leader objects to each and every Definition, Instruction, and Request to the extent it is premature because the Court has not yet construed the claim terms of U.S. Patent No. 7,139,761 ("the '761 Patent") and/or it seeks documents or information that are scheduled to be disclosed to Facebook on future dates directed by the Court.

14. Leader objects to each and every Definition, Instruction, and Request to the extent that it is vague and ambiguous.

15. Leader objects to each and every Definition, Instruction, and Request to the extent it is unduly burdensome and oppressive to the extent it subjects Leader to unreasonable and undue effort or expense.

16. Leader's written Responses and production of documents and things are based upon information and writings available to and located by its attorneys as of the date of these Responses. Leader has not completed its investigation of the facts relating to this case, has not

completed discovery in this action, and has not completed its preparation for trial. The information supplied herein is based only on such information and documents which are reasonably available and specifically known to Leader and its attorneys as of the date of these Responses. Therefore, Leader's written Responses and production of documents and things are made without prejudice to Leader's right to supplement and/or amend the written Responses and the production of documents and things and to present at any trial or other proceeding evidence discovered and produced hereafter.

17. Leader objects to each and every Definition, Instruction, and Request to the extent it is unduly burdensome and oppressive on the grounds that it purports to require Leader to search facilities other than those facilities that would reasonably be expected to have responsive information. Leader's Responses are based upon a reasonable search of facilities and files that could reasonably be expected to contain responsive information.

RESPONSES AND SPECIFIC OBJECTIONS TO REQUESTS

REQUEST FOR PRODUCTION NO. 92:

All documents referring to, relating to, or mentioning any efforts by LTI to mark any product and/or service with U.S. Patent No. 7139,761 B1 or the application or provisional application for such patent (including marking with "Patent Pending" or any other similar designation), including without limitation the identity of the product and/or service marked; the actual mark affixed to such product and/or service; each location where such mark appeared, including but not limited to every document, communication, web page URL, software screen, splash screen, user manual, and piece of marketing material; and all date(s) when such mark(s) appeared.

RESPONSE TO REQUEST FOR PRODUCTION NO. 92:

Leader objects to this Request as duplicative of other Requests. Leader objects to this Request to the extent it calls for a legal conclusion. Leader objects to this Request to the extent it seeks information which is outside the possession, custody or control of Leader. Leader objects to this Request to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable law, privilege, doctrine, or immunity. Leader objects to this Request to the extent it seeks to burden Leader with the production of publicly available documents and/or documents within the possession, custody or control of Facebook. Leader objects to this Request to the extent that it is nonsensical, particularly as to the phrases "any efforts by LTI to mark any product" and "including without limitation the identity of the product and/or service marked; the actual mark affixed to such product and/or service; each location where such mark appeared."

Subject to and without waiving the foregoing General and Specific objections, Leader responds as follows: to the extent Leader understands this Request and such documents exist, Leader has already produced the responsive documents.

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Dated: March 5, 2010
955809

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on March 5, 2010, true and correct copies of the within document were served on the following counsel of record, at the addresses and in the manner indicated:

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EXHIBIT K

**THIS EXHIBIT HAS BEEN
REDACTED IN ITS ENTIRETY**

EXHIBIT L

**THIS EXHIBIT HAS BEEN
REDACTED IN ITS ENTIRETY**

EXHIBIT M

**THIS EXHIBIT HAS BEEN
REDACTED IN ITS ENTIRETY**