## EXHIBIT E2

eader Technologies Inc. v. Facebook Ir

Doc. 470 Att. 13

## Exhibit E2

## Facebook's Motions in Limine, Evidentiary Issues, and Miscellaneous Issues

Facebook filed the following Motions in Limine and Daubert Motions on May 20, 2010:

- Motion in Limine No. 1: To Preclude any Doctrine of Equivalents Argument
- Motion in Limine No. 2: To Preclude Evidence or Argument Beyond the Three "Use Cases" Disclosed in Leader's Expert Report
- Motion in Limine No. 3: To Preclude Leader from Using the Term "Platform" to Refer to Facebook's Product
- Motion in Limine No. 4: To Preclude Evidence or Argument Relating to Internal Use of Accused Systems by Facebook Employees
- Motion in Limine No. 5: To Exclude the Deposition Errata of Jeffrey R. Lamb
- Motion in Limine No. 6: To Exclude Leader's Late-Produced Non-Disclosure Agreements
- Motion in Limine No. 7: To Exclude Reference to Any Other Litigation Involving Facebook or Mark Zuckerberg and the Circumstances Surrounding those Disputes
- Motion in Limine No. 8: To Preclude Leader from Referring to or Introducing Any Evidence Relating to Any Alleged Acts of "Hacking" or Unauthorized Access by Facebook or Mark Zuckerberg
- Motion in Limine No. 9: To Exclude Evidence or Argument that Mark Zuckerberg Copied Leader's White Papers
- Motion in Limine No. 10: To Preclude Leader Testimony on Topics for which Mr. McKibben Claimed Privilege at Deposition
- Motion in Limine No. 11: To Preclude References to Hurricane Katrina, Terrorism or Virginia Tech
- Daubert Motion No. 1: To Preclude Testimony by Leader Infringement Expert Giovanni Vigna
- Daubert Motion No. 2: To Preclude Testimony by Leader Expert James Herbsleb
- Daubert Motion No. 3: To Preclude Testimony by Leader Expert Russel L. Parr