

EXHIBIT C

SECURITIES AND EXCHANGE COMMISSION
New York Regional Office
3 World Financial Center - RM 400
New York, New York 10281-1022
(212) 336-0175

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

-against-

GALLEON MANAGEMENT, LP,
RAJ RAJARATNAM,
RAJIV GOEL,
ANIL KUMAR,
DANIELLE CHIESI,
MARK KURLAND,
ROBERT MOFFAT,
NEW CASTLE FUNDS LLC,
ROOMY KHAN,
DEEP SHAH,
ALI T. FAR,
CHOO-BENG LEE,
FAR & LEE LLC,
SPHERIX CAPITAL LLC,
ALI HARIRI,
ZVI GOFFER,
DAVID PLATE,
GAUTHAM SHANKAR,
SCHOTTENFELD GROUP LLC,
STEVEN FORTUNA,
and
S2 CAPITAL MANAGEMENT, LP,

Defendants.

09 Civ. 8811 (JSR)

ECF CASE

PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S
RESPONSES AND OBJECTIONS TO DEFENDANTS'
INTERROGATORIES TO PLAINTIFF

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Securities and Exchange Commission (“Commission”) hereby responds to the Interrogatories to Plaintiff (“Interrogatories”) of Defendants Galleon Management, LP, Rajiv Goel, Anil Kumar, Danielle Chiesi, Robert Moffat, New Castle Funds LLC, Ali T. Far, Choo-Beng Lee, and Schottenfeld Group LLC, as follows:

PRELIMINARY STATEMENT

1. The Commission’s detailed Amended Complaint (“Complaint”) sets forth the bases of its allegations and claims. On November 4, 2009, the Court issued an Order specifically limiting interrogatories to those in Local Rule 33.3(a). On November 10, 2009, the Commission served Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1) (“Initial Disclosures”) on Defendants complete with a listing of potential witnesses and subject matters as well as other relevant information required by Fed. R. Civ. P. 26(a)(1). Plaintiff supplemented and will supplement, as required, its Initial Disclosures pursuant to Fed. R. Civ. P. 26(e) (“Supplemental Disclosures”). To the extent Defendants’ Interrogatories do not comply with Local Rule 33.3(a), Plaintiff objects. To the extent they do comply, they call for information duplicative of that the Commission has already provided. Nevertheless, the Commission has made a good faith effort to respond to such Interrogatories but refers Defendants to its Initial and Supplemental Disclosures for additional information.

2. The Commission’s responses and objections are based upon current knowledge and reasonable inquiry to date. The Commission has not completed its discovery or trial preparation and is continuing to explore and develop facts relating to this action. Further, the depositions contemplated in this case have not yet been

completed and voluminous documents are still being analyzed. The Commission has nonetheless responded to most of the Interrogatories in an effort to advance the litigation, but notes that these responses and objections, while based on diligent efforts and inquiry, reflect only the current state of the Commission's knowledge, understanding and beliefs as to the matters inquired about, and may not be construed so as to limit in any way the facts or evidence which the Commission may offer or rely on in any proceeding, including this action. Further, the Commission may offer or rely on expert testimony and will make any responses and disclosures concerning such experts in accordance with the Court's Case Management Plan. The Commission reserves the right at any time to revise, supplement, correct, clarify, or add to its responses and objections as the Commission deems necessary and appropriate and as additional facts are ascertained in the course of this litigation.

3. The Commission's responses and objections do not constitute an admission or acknowledgement that any purported "fact" set forth, presupposed, or assumed by the Interrogatories in fact exists, is relevant, non-privileged or is admissible in evidence, or that any statement or characterization of the facts, events, circumstances, or issues described in the Interrogatories is relevant, accurate or complete.

4. The Commission makes these responses and objections subject to, and without waiving, all objections as to competence, relevance, materiality, propriety, privilege, authenticity, or the admissibility of the subject matter or the facts contained in any Interrogatory or in the Commission's response thereto. The Commission specifically reserves the right to object to the use of these responses and objections, or the subject matter thereof, on any ground in this action or in any other proceeding.

GENERAL OBJECTIONS

The Commission asserts the following objections to the Interrogatories in their entirety and incorporates such objections in its response to each individual Interrogatory below, as if fully set forth therein:

1. The Commission objects to the Interrogatories, including the Definitions and Instructions, to the extent that they seek to expand upon or alter, or are inconsistent with, the Commission's disclosure obligations under the Federal Rules of Civil Procedure, the Local Civil Rules, the Court's orders in this action, or other applicable law or rules. The Commission will respond to the Interrogatories to the extent required by the Federal Rules of Civil Procedure, the Local Civil Rules, the Court's orders, and other applicable law and rules.

2. The Commission objects to the Interrogatories, including the Definitions and Instructions, to the extent that they seek information outside the time period relevant to this action or after the filing of the Complaint.

3. The Commission will be providing Defendants with documents. The Commission objects to the Interrogatories to the extent that they require the Commission to cull and transcribe these documents in the form of interrogatory answers. Because Defendants may readily derive, assuming Defendants have not already done so, the majority of the requested information on its own from these documents and other materials in Defendants' possession, Interrogatories seeking such information are unduly burdensome and the Commission objects to them on that ground.

4. The Commission objects to the Interrogatories to the extent that they seek information that is not within the Commission's possession, custody, control, knowledge or understanding.

5. The Commission objects to the Interrogatories to the extent that they seek information that is publicly available or is equally available to, or within the possession, custody, control, knowledge or understanding of Defendants.

6. The Commission objects to the Interrogatories to the extent that they seek information that is privileged or otherwise legally protected from disclosure pursuant to the attorney-client privilege, the work product doctrine, the deliberative process privilege, the law enforcement privilege, or other applicable privilege or doctrine of nondisclosure. To the extent that information that is protected from disclosure is inadvertently disclosed in response to the Interrogatories, such disclosure shall not constitute a waiver of any privilege or immunity or the Commission's right to assert the applicability of any privilege or immunity, which right is hereby expressly reserved, and such information shall be returned to the Commission's counsel or destroyed immediately upon discovery thereof or upon the Commission's notification to Defendants' counsel.

7. The Commission objects to the Interrogatories to the extent that they seek information that is neither relevant to the subject matter of this action or any claim or defense relating thereto, nor reasonably calculated to lead to the discovery of admissible evidence.

8. The Commission objects to the Interrogatories to the extent that they are unreasonably overbroad, duplicative, unduly burdensome, unintelligible, ambiguous, vague, seek information that is not described with reasonable particularity, lack a readily discernible meaning, or require the Commission to speculate as to the information sought.

9. The Commission objects to the Interrogatories to the extent that they ask the Commission to identify "each" or "all" documents or persons supporting a

contention, allegation or position on the basis that such interrogatories are premature at this early stage of the litigation and are unduly burdensome. The Commission is not required to identify every one of the many documents and persons that may support a contention, allegation or position, particularly where scores of potential witnesses and many documents are involved and where many such witnesses and documents are already available to Defendant. Furthermore, once documents or persons supporting a contention, allegation or position are identified, continuing to identify “each” or “all” documents or persons that may support the contention, allegation or position is pointless and unreasonable. Without waiving and indeed expressly reserving and asserting this objection, the Commission has provided a response to the Interrogatories in question in an effort to advance the litigation, but notes that its responses to these discovery requests cannot and will not reference all documents and/or persons that may support an allegation, position or contention.

SPECIFIC RESPONSES AND OBJECTIONS

Subject to the foregoing Preliminary Statement and General Objections, and without waiving any of the General Objections, which are expressly preserved and incorporated by reference in each and every response below as if fully set forth therein, the Commission responds to the Interrogatories as follows:

INTERROGATORIES OF GALLEON MANAGEMENT, L.P.

1. Identify the existence, custodian, location, and general description of relevant documents and things considered or reviewed by the SEC or made available to the SEC in any manner concerning allegations in the Amended Complaint (or any parallel or related criminal complaint, information, or indictment) relating to Akamai including, but not limited to, the identity of all Witnesses and Informants with knowledge of information concerning Akamai, all transcripts of investigative testimonies and various exhibits thereto, historical trading data concerning Akamai Securities, brokerage account records concerning Akamai Securities, telephone and electronic communications records, correspondence, documents and other tangible items produced to the SEC by Akamai and other individuals and entities referred to in the Amended Complaint, publicly available documents, and anything else considered by or made available to the SEC even if such things are not currently under the custody or control of the SEC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 1 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 1 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 1 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 1, the Commission will produce such documents to Defendant.

2. Identify the existence, custodian, location, and general description of relevant documents and things considered or reviewed by the SEC or made available to the SEC in any manner concerning allegations in the Amended Complaint (or any parallel or related criminal complaint, information, or indictment) relating to AMD including, but not limited to, the identity of all Witnesses and Informants with knowledge of information concerning AMD, all transcripts of investigative testimonies and various

exhibits thereto, historical trading data concerning AMD Securities, brokerage account records concerning AMD Securities, telephone and electronic communications records, correspondence, documents and other tangible items produced to the SEC by AMD and other individuals and entities referred to in the Amended Complaint, publicly available documents, and anything else considered by or made available to the SEC even if such things are not currently under the custody or control of the SEC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 2 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 2 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 2 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 2, the Commission will produce such documents to Defendant.

3. Identify the existence, custodian, location, and general description of relevant documents and things considered or reviewed by the SEC or made available to the SEC in any manner concerning allegations in the Amended Complaint (or any parallel or related criminal complaint, information, or indictment) relating to Clearwire including, but not limited to, the identity of all Witnesses and Informants with knowledge of information concerning Clearwire, all transcripts of investigative testimonies and various exhibits thereto, historical trading data concerning Clearwire Securities, brokerage account records concerning Clearwire Securities, telephone and electronic communications records, correspondence, documents and other tangible items produced to the SEC by Clearwire and other individuals and entities referred to in the Amended Complaint, publicly available documents, and anything else considered by or made available to the SEC even if such things are not currently under the custody or control of the SEC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 3 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 3 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 3 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 3, the Commission will produce such documents to Defendant.

4. Identify the existence, custodian, location, and general description of relevant documents and things considered or reviewed by the SEC or made available to the SEC in any manner concerning allegations in the Amended Complaint (or any parallel or related criminal complaint, information, or indictment) relating to Google including, but not limited to, the identity of all Witnesses and Informants with knowledge of information concerning Google, all transcripts of investigative testimonies and various exhibits thereto, historical trading data concerning Google Securities, brokerage account records concerning Google Securities, telephone and electronic communications records, correspondence, documents and other tangible items produced to the SEC by Google and other individuals and entities referred to in the Amended Complaint, publicly available documents, and anything else considered by or made available to the SEC even if such things are not currently under the custody or control of the SEC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 4 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly

burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 4 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 4 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 4, the Commission will produce such documents to Defendant.

5. Identify the existence, custodian, location, and general description of relevant documents and things considered or reviewed by the SEC or made available to the SEC in any manner concerning allegations in the Amended Complaint (or any parallel or related criminal complaint, information, or indictment) relating to Hilton including, but not limited to, the identity of all Witnesses and Informants with knowledge of information concerning Hilton, all transcripts of investigative testimonies and various exhibits thereto, historical trading data concerning Hilton Securities, brokerage account records concerning Hilton Securities, telephone and electronic communications records, correspondence, documents and other tangible items produced to the SEC by Hilton and other individuals and entities referred to in the Amended Complaint, publicly available documents, and anything else considered by or made available to the SEC even if such things are not currently under the custody or control of the SEC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 5 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 5 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 5 the Commission refers Defendant to its

Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 5, the Commission will produce such documents to Defendant.

6. Identify the existence, custodian, location, and general description of relevant documents and things considered or reviewed by the SEC or made available to the SEC in any manner concerning allegations in the Amended Complaint (or any parallel or related criminal complaint, information, or indictment) relating to IBM including, but not limited to, the identity of all Witnesses and Informants with knowledge of information concerning IBM, all transcripts of investigative testimonies and various exhibits thereto, historical trading data concerning IBM Securities, brokerage account records concerning IBM Securities, telephone and electronic communications records, correspondence, documents and other tangible items produced to the SEC by IBM and other individuals and entities referred to in the Amended Complaint, publicly available documents, and anything else considered by or made available to the SEC even if such things are not currently under the custody or control of the SEC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 6 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 6 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 6 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 6, the Commission will produce such documents to Defendant.

7. Identify the existence, custodian, location, and general description of relevant documents and things considered or reviewed by the SEC or made available to the SEC

in any manner concerning allegations in the Amended Complaint (or any parallel or related criminal complaint, information, or indictment) relating to Intel including, but not limited to, the identity of all Witnesses and Informants with knowledge of information concerning Intel, all transcripts of investigative testimonies and various exhibits thereto, historical trading data concerning Intel Securities, brokerage account records concerning Intel Securities, telephone and electronic communications records, correspondence, documents and other tangible items produced to the SEC by Intel and other individuals and entities referred to in the Amended Complaint, publicly available documents, and anything else considered by or made available to the SEC even if such things are not currently under the custody or control of the SEC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 7 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 7 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 7 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 7, the Commission will produce such documents to Defendant.

8. Identify the existence, custodian, location, and general description of relevant documents and things considered or reviewed by the SEC or made available to the SEC in any manner concerning allegations in the Amended Complaint (or any parallel or related criminal complaint, information, or indictment) relating to PeopleSupport including, but not limited to, the identity of all Witnesses and Informants with knowledge of information concerning PeopleSupport, all transcripts of investigative testimonies and various exhibits thereto, historical trading data concerning PeopleSupport Securities, brokerage account records concerning PeopleSupport Securities, telephone and electronic communications records, correspondence, documents and other tangible items produced to the SEC by PeopleSupport and other individuals and entities referred to in the Amended Complaint, publicly available documents, and anything else considered by or

made available to the SEC even if such things are not currently under the custody or control of the SEC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 8 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 8 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 8 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 8, the Commission will produce such documents to Defendant.

9. Identify the existence, custodian, location, and general description of relevant documents and things considered or reviewed by the SEC or made available to the SEC in any manner concerning allegations in the Amended Complaint (or any parallel or related criminal complaint, information, or indictment) relating to Polycom including, but not limited to, the identity of all Witnesses and Informants with knowledge of information concerning Polycom, all transcripts of investigative testimonies and various exhibits thereto, historical trading data concerning Polycom Securities, brokerage account records concerning Polycom Securities, telephone and electronic communications records, correspondence, documents and other tangible items produced to the SEC by Polycom and other individuals and entities referred to in the Amended Complaint, publicly available documents, and anything else considered by or made available to the SEC even if such things are not currently under the custody or control of the SEC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 9 on the ground that, by seeking the identification of “all”

persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 9 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 9 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 9, the Commission will produce such documents to Defendant.

10. Identify the existence, custodian, location, and general description of relevant documents and things considered or reviewed by the SEC or made available to the SEC in any manner concerning allegations in the Amended Complaint (or any parallel or related criminal complaint, information, or indictment) relating to SUN including, but not limited to, the identity of all Witnesses and Informants with knowledge of information concerning SUN, all transcripts of investigative testimonies and various exhibits thereto, historical trading data concerning SUN Securities, brokerage account records concerning SUN Securities, telephone and electronic communications records, correspondence, documents and other tangible items produced to the SEC by SUN and other individuals and entities referred to in the Amended Complaint, publicly available documents, and anything else considered by or made available to the SEC even if such things are not currently under the custody or control of the SEC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 10 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 10 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any

objections, in response to Interrogatory No. 10 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 10, the Commission will produce such documents to Defendant.

11. Identify the existence, custodian, location, and general description of relevant documents and things considered or reviewed by the SEC or made available to the SEC in any manner concerning allegations in the Amended Complaint (or any parallel or related criminal complaint, information, or indictment) relating to Atheros including, but not limited to, the identity of all Witnesses and Informants with knowledge of information concerning Atheros, all transcripts of investigative testimonies and various exhibits thereto, historical trading data concerning Atheros Securities, brokerage account records concerning Atheros Securities, telephone and electronic communications records, correspondence, documents and other tangible items produced to the SEC by Atheros and other individuals and entities referred to in the Amended Complaint, publicly available documents, and anything else considered by or made available to the SEC even if such things are not currently under the custody or control of the SEC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 11 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 11 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 11 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 11, the Commission will produce such documents to Defendant.

12. Identify the existence, custodian, location, and general description of relevant documents and things considered or reviewed by the SEC or made available to the SEC in any manner concerning allegations in the Amended Complaint (or any parallel or related criminal complaint, information, or indictment) relating to Kronos including, but not limited to, the identity of all Witnesses and Informants with knowledge of information concerning Kronos, all transcripts of investigative testimonies and various exhibits thereto, historical trading data concerning Kronos Securities, brokerage account records concerning Kronos Securities, telephone and electronic communications records, correspondence, documents and other tangible items produced to the SEC by Kronos and other individuals and entities referred to in the Amended Complaint, publicly available documents, and anything else considered by or made available to the SEC even if such things are not currently under the custody or control of the SEC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 12 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 12 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 12 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 12, the Commission will produce such documents to Defendant.

13. Identify the existence, custodian, location, and general description of relevant documents and things considered or reviewed by the SEC or made available to the SEC in any manner concerning allegations in the Amended Complaint (or any parallel or related criminal complaint, information, or indictment) relating to Marvell Technology Group including, but not limited to, the identity of all Witnesses and Informants with knowledge of information concerning Marvell Technology Group, all transcripts of investigative testimonies and various exhibits thereto, historical trading data concerning Marvell Technology Group Securities, brokerage account records concerning Marvell Technology Group Securities, telephone and electronic communications records,

correspondence, documents and other tangible items produced to the SEC by Marvell Technology Group and other individuals and entities referred to in the Amended Complaint, publicly available documents, and anything else considered by or made available to the SEC even if such things are not currently under the custody or control of the SEC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 13 on the ground that it seeks information concerning allegations not contained in the Amended Complaint. Additionally, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive. Also, it seeks information that is legally protected from disclosure by, among other things, the attorney-client privilege, the work product doctrine, the deliberative process privilege and the law enforcement privilege, and seeks information that is not in the possession, custody or control of the Commission.

14. Identify the existence, custodian, location, and general description of relevant documents and things considered or reviewed by the SEC or made available to the SEC in any manner concerning allegations in the Amended Complaint (or any parallel or related criminal complaint, information, or indictment) relating to Avaya Inc. including, but not limited to, the identity of all Witnesses and Informants with knowledge of information concerning Avaya Inc., all transcripts of investigative testimonies and various exhibits thereto, historical trading data concerning Avaya Inc. Securities, brokerage account records concerning Avaya Inc. Securities, telephone and electronic communications records, correspondence, documents and other tangible items produced to the SEC by Avaya Inc. and other individuals and entities referred to in the Amended Complaint, publicly available documents, and anything else considered by or made available to the SEC even if such things are not currently under the custody or control of the SEC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 14 on the ground that it seeks information concerning

allegations not contained in the Amended Complaint. Additionally, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive. Also, it seeks information that is legally protected from disclosure by, among other things, the attorney-client privilege, the work product doctrine, the deliberative process privilege and the law enforcement privilege, and seeks information that is not in the possession, custody or control of the Commission.

15. Identify the existence, custodian, location, and general description of relevant documents and things considered or reviewed by the SEC or made available to the SEC in any manner concerning allegations in the Amended Complaint (or any parallel or related criminal complaint, information, or indictment) relating to Axcan Pharma Inc. including, but not limited to, the identity of all Witnesses and Informants with knowledge of information concerning Axcan Pharma Inc., all transcripts of investigative testimonies and various exhibits thereto, historical trading data concerning Axcan Pharma Inc. Securities, brokerage account records concerning Axcan Pharma Inc. Securities, telephone and electronic communications records, correspondence, documents and other tangible items produced to the SEC by Axcan Pharma Inc. and other individuals and entities referred to in the Amended Complaint, publicly available documents, and anything else considered by or made available to the SEC even if such things are not currently under the custody or control of the SEC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 15 on the ground that it seeks information concerning allegations not contained in the Amended Complaint. Additionally, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive. Also, it seeks information that is legally protected from disclosure by, among other things, the attorney-client privilege, the work product doctrine, the deliberative process privilege and the law

enforcement privilege, and seeks information that is not in the possession, custody or control of the Commission.

16. Identify the existence, custodian, location, and general description of relevant documents and things considered or reviewed by the SEC or made available to the SEC in any manner concerning allegations in the Amended Complaint (or any parallel or related criminal complaint, information, or indictment) relating to 3Com Corporation including, but not limited to, the identity of all Witnesses and Informants with knowledge of information concerning 3Com Corporation, all transcripts of investigative testimonies and various exhibits thereto, historical trading data concerning 3Com Corporation Securities, brokerage account records concerning 3Com Corporation Securities, telephone and electronic communications records, correspondence, documents and other tangible items produced to the SEC by 3Com Corporation and other individuals and entities referred to in the Amended Complaint, publicly available documents, and anything else considered by or made available to the SEC even if such things are not currently under the custody or control of the SEC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 16 on the ground that it seeks information concerning allegations not contained in the Amended Complaint. Additionally, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive. Also, it seeks information that is legally protected from disclosure by, among other things, the attorney-client privilege, the work product doctrine, the deliberative process privilege and the law enforcement privilege, and seeks information that is not in the possession, custody or control of the Commission.

17. Identify the existence, custodian, location, and general description of relevant documents and things considered or reviewed by the SEC or made available to the SEC in any manner concerning allegations in the Amended Complaint (or any parallel or related criminal complaint, information, or indictment) relating to Schering-Plough Corporation including, but not limited to, the identity of all Witnesses and Informants with knowledge of information concerning Schering-Plough Corporation, all transcripts of investigative testimonies and various exhibits thereto, historical trading data concerning Schering-Plough Corporation Securities, brokerage account records

concerning Schering-Plough Corporation Securities, telephone and electronic communications records, correspondence, documents and other tangible items produced to the SEC by Schering-Plough Corporation and other individuals and entities referred to in the Amended Complaint, publicly available documents, and anything else considered by or made available to the SEC even if such things are not currently under the custody or control of the SEC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 17 on the ground that it seeks information concerning allegations not contained in the Amended Complaint. Additionally, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive. Also, it seeks information that is legally protected from disclosure by, among other things, the attorney-client privilege, the work product doctrine, the deliberative process privilege and the law enforcement privilege, and seeks information that is not in the possession, custody or control of the Commission.

18. Identify the existence, custodian, location, and general description of relevant documents and things considered or reviewed by the SEC or made available to the SEC in any manner concerning allegations in the Amended Complaint (or any parallel or related criminal complaint, information, or indictment) relating to Alliance Data Systems Corporation including, but not limited to, the identity of all Witnesses and Informants with knowledge of information concerning Alliance Data Systems Corporation, all transcripts of investigative testimonies and various exhibits thereto, historical trading data concerning Alliance Data Systems Corporation Securities, brokerage account records concerning Alliance Data Systems Corporation Securities, telephone and electronic communications records, correspondence, documents and other tangible items produced to the SEC by Alliance Data Systems Corporation and other individuals and entities referred to in the Amended Complaint, publicly available documents, and anything else considered by or made available to the SEC even if such things are not currently under the custody or control of the SEC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 18 on the ground that it seeks information concerning

allegations not contained in the Amended Complaint. Additionally, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive. Also, it seeks information that is legally protected from disclosure by, among other things, the attorney-client privilege, the work product doctrine, the deliberative process privilege and the law enforcement privilege, and seeks information that is not in the possession, custody or control of the Commission.

19. Identify the existence, custodian, location, and general description of relevant documents and things considered or reviewed by the SEC or made available to the SEC in any manner concerning allegations in the Amended Complaint (or any parallel or related criminal complaint, information, or indictment) relating to Adesa, Inc. including, but not limited to, the identity of all Witnesses and Informants with knowledge of information concerning Adesa, Inc., all transcripts of investigative testimonies and various exhibits thereto, historical trading data concerning Adesa, Inc. Securities, brokerage account records concerning Adesa, Inc. Securities, telephone and electronic communications records, correspondence, documents and other tangible items produced to the SEC by Adesa, Inc. and other individuals and entities referred to in the Amended Complaint, publicly available documents, and anything else considered by or made available to the SEC even if such things are not currently under the custody or control of the SEC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 19 on the ground that it seeks information concerning allegations not contained in the Amended Complaint. Additionally, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive. Also, it seeks information that is legally protected from disclosure by, among other things, the attorney-client privilege, the work product doctrine, the deliberative process privilege and the law

enforcement privilege, and seeks information that is not in the possession, custody or control of the Commission.

20. Identify the existence, custodian, location, and general description of relevant documents and things considered or reviewed by the SEC or made available to the SEC in any manner concerning allegations in the Amended Complaint (or any parallel or related criminal complaint, information, or indictment) relating to EMC Corporation including, but not limited to, the identity of all Witnesses and Informants with knowledge of information concerning EMC Corporation, all transcripts of investigative testimonies and various exhibits thereto, historical trading data concerning EMC Corporation Securities, brokerage account records concerning EMC Corporation Securities, telephone and electronic communications records, correspondence, documents and other tangible items produced to the SEC by EMC Corporation and other individuals and entities referred to in the Amended Complaint, publicly available documents, and anything else considered by or made available to the SEC even if such things are not currently under the custody or control of the SEC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 20 on the ground that it seeks information concerning allegations not contained in the Amended Complaint. Additionally, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive. Also, it seeks information that is legally protected from disclosure by, among other things, the attorney-client privilege, the work product doctrine, the deliberative process privilege and the law enforcement privilege, and seeks information that is not in the possession, custody or control of the Commission.

21. Identify the existence, custodian, location, and general description of relevant documents and things considered or reviewed by the SEC or made available to the SEC in any manner in its investigation of Galleon including, but not limited to, the identity of all Witnesses and Informants with knowledge of information concerning Galleon, all transcripts of investigative testimonies and various exhibits thereto, historical trading data concerning relevant Securities, brokerage account records concerning relevant Securities, telephone and electronic communications records, correspondence, documents and other tangible items produced to the SEC by Galleon and other individuals and entities referred

to in the Amended Complaint, publicly available documents, and anything else considered by or made available to the SEC even if such things are not currently under the custody or control of the SEC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 21 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 21 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 21 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 21, the Commission will produce such documents to Defendant.

22. Identify all documents and things that the SEC intends to offer in support of its case-in-chief.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 22 on the ground that it is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 22 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 22 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has

non-privileged, relevant documents responsive to Interrogatory No. 22, the Commission will produce such documents to Defendant.

23. Identify all documents and anything else relied upon by the SEC in its computation of the relief sought in the Amended Complaint, including, but not limited to, "illicit trading profits, other ill-gotten gains received, and/or losses avoided."

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 23 on the ground that it is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 23 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 23 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 23, the Commission will produce such documents to Defendant.

24. All information provided by the SEC in response to interrogatories to the SEC from any other party to this Action.

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 24 on the ground that it is premature at this early stage of the litigation. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 24, the Commission will produce such documents to Defendant.

25. All information provided to the SEC by any other party to this Action in response to the SEC's interrogatories to such parties.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 25 on the ground that it is premature at this early stage of the litigation. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 25, the Commission will produce such documents to Defendant.

INTERROGATORIES OF RAJIV GOEL

1. Identify all Witnesses with knowledge of information relating to the Hilton Transaction, including the person referred to as "someone" in Paragraph 62 of the Complaint and "Tipper X" as alleged in Paragraphs 63-64 of the Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 1 on the ground that, by seeking the identification of "all" persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 1 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 1 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 1, the Commission will produce such documents to Defendant.

"Someone" referred to in paragraph 62 is an individual acting at Raj Rajaratnam's direction; "Tipper X" is Tom Hardin.

2. Identify all Witnesses with knowledge of information relating to Intel Earnings, including the "member" or "contact" in "Intel's IR department" with whom Mr. Goel is

alleged to have "communicated" or "reached out" to in Paragraphs 98-99 of the Complaint and the "portfolio manager of certain Galleon hedge funds" as alleged in Paragraph 99 of the complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 2 on the ground that, by seeking the identification of "all" persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 2 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 2 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 2, the Commission will produce such documents to Defendant.

The "member" or "contact" in "Intel's IR department" with whom Mr. Goel is alleged to have "communicated" or "reached out" to in Paragraphs 98-99 of the Complaint is believed to be Alex Lenke and the portfolio manager of certain Galleon hedge funds as alleged in Paragraph 99 of the complaint is Todd Deutsch.

4. Identify all Witnesses with knowledge of information relating to the Clearwire Transaction.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 4 on the ground that, by seeking the identification of "all" persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly

burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 4 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 4 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 4, the Commission will produce such documents to Defendant.

5. Identify all Witnesses with knowledge of information relating to the PeopleSupport Transaction, including the "managing director at Galleon" who served on PeopleSupport's Board of Directors as alleged in Paragraph 113 of the Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 5 on the ground that, by seeking the identification of "all" persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 5 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 5 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 5, the Commission will produce such documents to Defendant.

The "managing director at Galleon" who served on PeopleSupport's Board of Directors as alleged in Paragraph 113 of the Complaint is Krish Panu.

6. Identify all documents concerning the computation of relief sought by Plaintiff, including "illicit trading profits, other ill-gotten gains received, and/or losses avoided," prejudgment interest, and civil monetary penalties as alleged in the Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 6 on the ground that it is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 6 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 6 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 6, the Commission will produce such documents to Defendant.

7. Specify the disgorgement and civil penalties sought from Mr. Goel for each alleged act of securities fraud, including the manner by which the disgorgement and civil penalties sought from Mr. Goel were calculated and the identity of each person with knowledge of the calculation described.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 7 on the ground that it is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 7 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 7 the Commission refers

Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 7, the Commission will produce such documents to Defendant.

8. Identify all Witnesses with knowledge that Mr. Goel possessed material nonpublic information concerning a Public Company as alleged in the Complaint, and for each such Witness state the Public Company in question.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 8 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 8 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 8 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 8, the Commission will produce such documents to Defendant.

9. Identify the existence, custodian, location, and general description of relevant Documents and things not produced in response to Mr. Goel's First Request for Production of Documents from Plaintiff, including physical evidence, or information of a similar nature relating to the allegations in the Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 9 on the ground that it is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 9 on the ground that it

seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 9 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 9, the Commission will produce such documents to Defendant.

INTERROGATORIES OF ANIL KUMAR

1. With respect to the SEC's allegation that Defendant Anil Kumar is or was "a direct or indirect investor in one or more funds managed by Galleon", identify: a) all persons with knowledge of the allegation and b) all documents and physical evidence known to exist concerning the allegation.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 1 on the ground that, by seeking the identification of "all" persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 1 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 1 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 1, the Commission will produce such documents to Defendant.

2. With respect to the SEC's allegation that Defendant Anil Kumar "provided material nonpublic information to Rajaratnam about the AMD Transactions prior to the October 7, 2008 public announcement concerning those transactions," identify: a) all persons with

knowledge of the allegation and b) all documents and physical evidence known to exist concerning the allegation.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 2 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 2 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 2 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 2, the Commission will produce such documents to Defendant.

3. With respect to the SEC's allegation that "Kumar and Rajaratnam communicated various times concerning the AMD transaction," identify: a) all persons with knowledge of the allegation and b) all documents and physical evidence known to exist concerning the allegation.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 3 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 3 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the

possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 3 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 3, the Commission will produce such documents to Defendant.

4. With respect to the SEC's allegation that the information alleged to have been conveyed by Defendant Anil Kumar to Raj Rajaratnam about the AMD Transaction was material and nonpublic," identify: a) all persons with knowledge of the allegation and b) all documents and physical evidence known to exist concerning the allegation.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 4 on the ground that, by seeking the identification of "all" persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 4 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 4 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 4, the Commission will produce such documents to Defendant.

5. With respect to the SEC's allegation that Defendant Anil Kumar gave material nonpublic information to Raj Rajaratnam "with the expectation of receiving a benefit," identify: a) all persons with knowledge of the allegation and b) all documents and physical evidence known to exist concerning the allegation.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 5 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 5 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 5 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 5, the Commission will produce such documents to Defendant.

6. With respect to the SEC's allegation that Defendant Anil Kumar "is a friend of Rajaratnam," identify: a) all persons with knowledge of the allegation and b) all documents and physical evidence known to exist concerning the allegation.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 6 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 6 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 6 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged,

relevant documents responsive to Interrogatory No. 6, the Commission will produce such documents to Defendant.

7. State whether the SEC is seeking disgorgement from Defendant Anil Kumar. If so, state the amount of disgorgement sought, the means by which it was computed, and identify: a) all persons with knowledge of the allegation and b) all documents and physical evidence known to exist concerning the allegation.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 7 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 7 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 7 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 7, the Commission will produce such documents to Defendant.

The SEC seeks disgorgement from Defendant Anil Kumar for ill-gotten gains and/or losses avoided by any insider trading by Kumar and by his downstream tippees.

8. State whether the SEC is seeking civil penalties from Defendant Anil Kumar pursuant to Section 21(d)(3) of the Securities Exchange Act of 1934. If so, state the amount of the penalty sought by the SEC and how such amount was computed.

Response

The SEC is seeking the maximum civil penalties from Defendant Anil Kumar authorized by Section 21(d)(3) of the Securities Exchange Act of 1934.

9. State whether the SEC is seeking civil penalties from Defendant Anil Kumar pursuant to Section 21A of the Securities Exchange Act of 1934. If so, state the amount of profit gained or loss avoided that the SEC claims resulted from Defendant Kumar's violation of the Exchange Act and state the means by which the SEC computed said amount.

Response

The SEC is seeking the maximum civil penalties from Defendant Anil Kumar authorized by Section 21A of the Securities Exchange Act of 1934.

10. Identify all documents, including but not limited to FBI 302 reports, concerning interviews of witnesses with knowledge about the AMD Transaction.

Response

Subject to and without waiving any objections, in response to Interrogatory No. 10, the Commission refers Defendant to its Initial and Supplemental Disclosures. The Commission has attorney notes of an interview with Steven Fortuna, which are privileged and will not be produced. The notes contain attorney thoughts and mental impressions. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 10, the Commission will produce such documents to Defendant.

11. Identify all documents, including but not limited to FBI 302 reports, concerning interviews of witnesses with knowledge about Defendant Anil Kumar's communications with Raj Rajaratnam.

Response

Subject to and without waiving any objections, in response to Interrogatory No. 11, the Commission refers Defendant to its Initial and Supplemental Disclosures. To the

extent the Commission has non-privileged, relevant documents responsive to

Interrogatory No. 11, the Commission will produce such documents to Defendant.

12. Identify all documents and physical evidence, including but not limited to wiretap recordings and transcripts, concerning communications between Defendant Anil Kumar and Raj Rajaratnam.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 12 on the grounds that it is extremely overbroad, and seeks information that is legally protected from disclosure by, among other things, the attorney-client privilege, the work product doctrine, the deliberative process privilege and the law enforcement privilege, and seeks information that is neither in the possession, custody or control of the Commission nor relevant to the subject matter of this action. Subject to and without waiving any objections, in response to Interrogatory No. 12, the Commission refers Defendant to its Initial and Supplemental Disclosures.

Subject to and without waiving any objections, the Commission will produce in response to Interrogatory No. 12 non-privileged documents that comprise its investigative files and that relate to the subject matter of this action.

INTERROGATORIES OF DANIELLE CHIESI

1. Identify the "Akamai Source" referenced in paragraph 117 and subsequent paragraphs of the Amended Complaint.

Response

The Akamai Source is Kieran Taylor.

2. Identify the "AMD Executive" referenced in paragraph 132 and subsequent paragraphs of the Amended Complaint.

Response

The AMD Executive is Hector Ruiz.

3. Identify the "third party" referenced in paragraph 127 of the Amended Complaint.

Response

Upon information and belief, the "third party" is the individual identified as "CW1" in the Criminal Complaint, U.S. V. Chiesi et al., filed October 15, 2009.

4. Identify the "employee of another hedge fund" referenced in paragraph 146 of the Amended Complaint.

Response

Upon information and belief, the "employee of another hedge fund" is the individual identified as "CW1" in the Criminal Complaint, U.S. V. Chiesi et al., filed October 15, 2009.

5. Identify "CC" referenced in paragraph 28(t) of the Parallel Criminal Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 5 on the grounds that it seeks information that is legally protected from disclosure by, among other things, the attorney-client privilege, the work product doctrine, the deliberative process privilege and the law enforcement privilege, and seeks information that is neither in the possession, custody or control of the Commission nor relevant to the subject matter of this action. Subject to and without waiving any objections, in response to Interrogatory No. 5, the Commission refers Defendant to its Initial and Supplemental Disclosures.

Subject to and without waiving any objections, the Commission will produce in response to Interrogatory No. 5 non-privileged documents that comprise its investigative files and that relate to the subject matter of this action.

6. Identify "CW-1" referenced in paragraph 20 and subsequent paragraphs of the Parallel Criminal Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 6 on the grounds that it seeks information that is legally protected from disclosure by, among other things, the attorney-client privilege, the work product doctrine, the deliberative process privilege and the law enforcement privilege, and seeks information that is neither in the possession, custody or control of the Commission nor relevant to the subject matter of this action. Subject to and without waiving any objections, in response to Interrogatory No. 6, the Commission refers Defendant to its Initial and Supplemental Disclosures.

Subject to and without waiving any objections, the Commission will produce in response to Request No. 6 non-privileged documents that comprise its investigative files and that relate to the subject matter of this action.

7. Identify "CW-2" referenced in paragraph 30 and subsequent paragraphs of the Parallel Criminal Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Request No. 7 on the grounds that it seeks information that is legally protected from disclosure by, among other things, the attorney-client privilege, the work product doctrine, the deliberative process privilege and the law enforcement privilege, and seeks information that is neither in the possession, custody or control of the Commission nor relevant to the subject matter of this action. Subject to and without waiving any

objections, in response to Interrogatory No. 7, the Commission refers Defendant to its Initial and Supplemental Disclosures.

Subject to and without waiving any objections, the Commission will produce in response to Request No. 7 non-privileged documents that comprise its investigative files and that relate to the subject matter of this action.

8. Identify the "individual affiliated with New Castle" referenced in paragraph 30(c) of the Parallel Criminal Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 8 on the grounds that it seeks information that is legally protected from disclosure by, among other things, the attorney-client privilege, the work product doctrine, the deliberative process privilege and the law enforcement privilege, and seeks information that is neither in the possession, custody or control of the Commission nor relevant to the subject matter of this action. Subject to and without waiving any objections, in response to Interrogatory No. 8, the Commission refers Defendant to its Initial and Supplemental Disclosures.

Subject to and without waiving any objections, the Commission will produce in response to Interrogatory No. 8 non-privileged documents that comprise its investigative files and that relate to the subject matter of this action.

9. Identify the existence, custodian, location, and general description of all relevant documents and things obtained by Plaintiff or any Law Enforcement Officer, concerning allegations referenced in the Amended Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 9 on the ground that, by seeking the identification of "all"

persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 9 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 9 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 9, the Commission will produce such documents to Defendant.

INTERROGATORIES OF ROBERT MOFFAT

1. Identify all documents concerning the computation of relief sought by the SEC, including-but not limited to "illicit trading profits, other ill-gotten gains received, and/or losses avoided" and "civil monetary penalties" as alleged in the Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 1 on the ground that it is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 1 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 1 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 1, the Commission will produce such documents to Defendant.

2. Identify the existence, custodian, location, and general description of relevant documents and things, including but not limited to physical evidence obtained through

Surveillance or other information of a similar nature, concerning allegations concerning Securities referenced in the Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 2 on the ground that it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 2 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 2 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 2, the Commission will produce such documents to Defendant.

INTERROGATORIES OF NEW CASTLE FUNDS LLC

1. Identify all Witnesses and Informants with knowledge of information relevant to the allegations against New Castle, Mark Kurland or Danielle Chiesi.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 1 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 1 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any

objections, in response to Interrogatory No. 1 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 1, the Commission will produce such documents to Defendant.

2. Identify all Documents Concerning the computation of each category of relief sought by Plaintiff against New Castle in the Amended Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 2 on the ground that it is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 2 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 2 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 2, the Commission will produce such documents to Defendant.

INTERROGATORIES OF ALI T. FAR

1. Identify all persons with knowledge of information relevant to the following allegations in the Complaint: a) As alleged in paragraph 2(xi) of the Complaint: "Hariri, an Atheros Communications, Inc. executive tipped Far to [sic] material nonpublic information about Atheros's Q4 2008 earnings. Far tipped Lee, and Far and Lee both traded based on that information on behalf of Spherix Capital." b) As alleged in paragraph 77 of the Complaint: "The Google source also provided Lee with specific information about Google's Q2 2007 disappointing earnings prior to the issuance of Google's July 19, 2007 earnings release. The Google Source is a family friend of Lee's and Lee knew, at the time, that the Google Source was employed at Google's investor relations firm. Lee shared the information from the Google Source with Lee's business partner, Far, and Far and Lee traded based on the information in a joint account they held in the name of Far & Lee LLC. On the morning of July 19, 2007, before the earnings announcement, Far and Lee caused Far & Lee LLC to purchase 200 July 2007 \$540

Google put option contracts, a position they closed out after Google's announcement for a profit of over \$390,000. In addition, Lee purchased Google put options in his personal account for a profit of over \$71,000." c) The allegations contained in paragraphs 149 through 153 of the Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 1 on the ground that, by seeking the identification of "all" persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 1 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 1 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 1, the Commission will produce such documents to Defendant.

2. Identify all persons with knowledge or information concerning Far's alleged involvement in or knowledge of the alleged insider trading schemes described in the Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 2 on the ground that, by seeking the identification of "all" persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 2 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the

possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 2 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 2, the Commission will produce such documents to Defendant.

3. Identify all persons with knowledge or information concerning any communications between you and Far, including, but not limited to, written correspondence, diary entries, notes of telephone calls or meetings, electronic mail, and attendance or participation sheets from conference calls or shareholders' meetings.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 3 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 3 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 3 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 3, the Commission will produce such documents to Defendant.

4. Identify any and all persons who have acted on your behalf with respect to, or who have investigated, the matters set forth in the Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 4 on the ground that does not seek information relevant to the allegations in the Amended Complaint.

5. Identify each and every expert witness that Plaintiff will call to testify at trial, and for each expert state: a) His or her field of specialty or expertise; b) Any sub-specialties of the witness within his or her field of expertise; c) The subject matter on which he or she is expected to testify; d) All opinions that he or she is expected to express and the basis and reasons for such opinions; e) The data or other information he or she considered in forming his or her opinion(s); f) Any exhibits to be used as a summary of or support for his or her opinion(s); g) His or her qualifications, including a list of all publications that he or she authored within ten (10) years preceding the date of this request; h) The compensation paid and to be paid to him or her for the study and the testimony; and i) All other cases in which he or she has testified as an expert at trial or by deposition within four (4) years preceding the date of this request.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 5 on the ground that is premature at this early stage of the litigation.

INTERROGATORIES OF CHOO-BENG LEE

1. Identify each person with knowledge of information concerning the allegations in the Complaint against Mr. Lee.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 1 on the ground that, by seeking the identification of “each” person with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 1 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any

objections, in response to Interrogatory No. 1 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 1, the Commission will produce such documents to Defendant.

2. Identify each person with knowledge of information concerning the allegations in the Complaint against Far & Lee LLC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 2 on the ground that, by seeking the identification of “each” person with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 2 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 2 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 2, the Commission will produce such documents to Defendant.

3. Identify each person with knowledge of information concerning the allegations in the Complaint against Spherix Capital LLC.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 3 on the ground that, by seeking the identification of “each” person with knowledge on a broad set of allegations, it is extremely overbroad, unduly

burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 3 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 3 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 3, the Commission will produce such documents to Defendant.

4. Identify all documents relating to the allegations in the Complaint against Mr. Lee and any relevant conduct.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 4 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 4 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 4, the Commission will produce such documents to Defendant.

5. State your calculation of Mr. Lee's trading profit, other ill-gotten gain received and/or losses avoided as a result of the allegations made in the Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 5 on the ground that it is premature at this early stage of the

litigation. The Commission further objects to Interrogatory No. 5 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 5 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 5, the Commission will produce such documents to Defendant.

6. Identify all documents upon which you base your calculation of Mr. Lee's trading profit, other ill-gotten gain received, and/or losses avoided as a result of the allegations made in the Complaint and any relevant conduct.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 6 on the ground that it is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 6 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 6 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 6, the Commission will produce such documents to Defendant.

7. Identify each person with knowledge of the "specific information" provided by the "Google Source" to Mr. Lee referenced in Paragraph 77 of the Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 7 on the ground that, by seeking the identification of "each"

person with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 7 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 7 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 7, the Commission will produce such documents to Defendant.

8. Identify each person with knowledge of information concerning Mr. Lee's communications with the "Google Source" relating to Google's July 19, 2008 earnings release, referenced in Paragraph 77 of the Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 8 on the ground that, by seeking the identification of "each" person with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 8 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 8 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 8, the Commission will produce such documents to Defendant.

9. Identify each person with knowledge of information concerning the allegation that Mr. Lee knew or should have known that the information he received from the “Google Source” was material and non-public information.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 9 on the ground that, by seeking the identification of “each” person with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 9 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 9 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 9, the Commission will produce such documents to Defendant.

10. Identify each person with knowledge of information concerning Mr. Far’s communications with Mr. Lee relating to “Atheros’s December 17, 2009 earnings pre-announcement” reference in Paragraph 151 of the Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 10 on the ground that, by seeking the identification of “each” person with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 10 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already

in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 10 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 10, the Commission will produce such documents to Defendant.

11. Identify each person with knowledge of the allegation Paragraph 151 of the Complaint that Mr. Lee “knew that Far was receiving material nonpublic information from an inside source at Atheros.”

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 11 on the ground that, by seeking the identification of “each” person with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 11 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 11 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 11, the Commission will produce such documents to Defendant.

INTERROGATORIES OF SCHOTTENFELD GROUP LLC

1. With respect to the allegations in the Complaint, identify all persons who provided or were provided with material non-public information relating to Hilton Hotels Corporation (“Hilton”), Google, Inc. (“Google”) or Kronos Inc. (“Kronos”), including but not limited to Deep Shah, Roomy Khan, “Tipper X” (as defined in paragraph 63 of the Complaint),

the “Google source” (as defined in paragraph 66 of the Complaint), the “Kronos source” (as defined in paragraph 80 of the Complaint), Gautham Shankar, Zvi Goffer and David Plate. For each person identified, set forth a summary of the person’s information that supports the allegations in the Complaint: (a) the person’s full name, last known address, telephone number, and company affiliation; (b) the date on which the material non-public information was disclosed; (c) the location at which the material non-public information was disclosed; (d) the method of communication by which the material non-public information was disclosed; (e) the nature of the material non-public information disclosed; (f) the source of the material non-public information disclosed; (g) the identity of any third party who was present with either the provider or recipient of the material non-public information when it was disclosed; and (h) any document relating to the material non-public information reflecting such information.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 1 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 1 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 1 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 1, the Commission will produce such documents to Defendant.

2. With respect to the allegations in the Complaint, state whether you contend that any affiliate, officer, director, employee, or agent of Schottenfeld Group, other than the Defendants named in the Complaint, obtained any material non-public information concerning Hilton, Google or Kronos, and if so, identify: (a) the person’s full name, last known address, telephone number, and company affiliation; (b) the date on which the material non-public information was disclosed; (c) the location at which the material non-public information was disclosed; (d) the method of communication by which the material non-public information was disclosed; (e) the nature of the material non-public information disclosed; (f) the source of the material non-public information disclosed; (g)

the identity of any third party who was present with either the provider or recipient of the material non-public information when it was disclosed; and (h) any document relating to the material non-public information reflecting such information.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 2 on the ground that it is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 2 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 2 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 2, the Commission will produce such documents to Defendant.

3. With respect to the allegations in the Complaint, identify all affiliates, officers, directors, employees or agents of Schottenfeld Group, other than the Defendants named in the Complaint, referred to in Plaintiff's allegations, including, but not limited to, those persons referred to in paragraph 64 of the Complaint as "associates at Schottenfeld" and in paragraph 90 of the Complaint as "others at Schottenfeld."

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 3 on the ground that it is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 3 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 3 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has

non-privileged, relevant documents responsive to Interrogatory No. 3, the Commission will produce such documents to Defendant.

4. With respect to the allegations in the Complaint, identify all payments relating to material non-public information concerning Hilton, Google or Kronos, including but not limited to: the alleged \$10,000 payment provided by Goffer to Shankar, as alleged in paragraph 64 of the Complaint; the alleged \$15,000 payment provided by Tipper X to Khan, as alleged in paragraph 75 of the Complaint; and the \$5,000 payment provided by Shankar to Tipper X, as alleged in paragraph 75 of the Complaint. For each payment identified, set forth the following information: (a) the full name, last known address, telephone number, and company affiliation of both payor and payee; (b) the date on which the payment was made; (c) the method by which the payment was made; (d) the location at which the payment was made; (e) the amount and nature of the payment; (f) the identity of any third party who was present with either the payor or payee at the time the payment was made; and (g) the identity, custodian, location, and general description of any document concerning the payment.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 4 on the ground that it is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 4 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 4 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 4, the Commission will produce such documents to Defendant.

5. Identify the existence, custodian, location and general description of relevant documents considered by, reviewed by or made available to Plaintiff or any other Law Enforcement Officer concerning any of the allegations in the Complaint or any parallel or related investigation or proceeding relating to Hilton including, but not limited to, the identity of all persons who provided information to Plaintiff or any other Law Enforcement Officer concerning Hilton, all transcripts or summaries of any conversations, interviews or meetings, notes, e-mails, documents produced by any party in this action, documents shown to any party in this action, copies

and/or images of electronic files, Wells notices and submissions, cooperation agreements, trading data concerning Hilton securities, telephone and electronic communications records and recordings, correspondence, documents and other tangible items produced to Plaintiff, publicly available documents, and anything else considered by or made available to Plaintiff.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 5 on the ground that it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 5 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 5 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 5, the Commission will produce such documents to Defendant.

6. Identify the existence, custodian, location and general description of relevant documents considered by, reviewed by or made available to Plaintiff or any other Law Enforcement Officer concerning any of the allegations in the Complaint or any parallel or related investigation or proceeding relating to Google including, but not limited to, the identity of all persons who provided information to Plaintiff or any other Law Enforcement Officer concerning Google, all transcripts or summaries of any conversations, interviews or meetings, notes, e-mails, documents produced by any party in this action, documents shown to any party in this action, copies and/or images of electronic files, Wells notices and submissions, cooperation agreements, trading data concerning Google securities, telephone and electronic communications records and recordings, correspondence, documents and other tangible items produced to Plaintiff, publicly available documents, and anything else considered by or made available to Plaintiff.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 6 on the ground that it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 6 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 6 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 6, the Commission will produce such documents to Defendant.

7. Identify the existence, custodian, location and general description of relevant documents considered by, reviewed by or made available to Plaintiff or any other Law Enforcement Officer concerning any of the allegations in the Complaint or any parallel or related investigation or proceeding relating to Kronos including, but not limited to, the identity of all persons who provided information to Plaintiff or any other Law Enforcement Officer concerning Kronos, all transcripts or summaries of any conversations, interviews or meetings, notes, e-mails, documents produced by any party in this action, documents shown to any party in this action, copies and/or images of electronic files, Wells notices and submissions, cooperation agreements, trading data concerning Kronos securities, telephone and electronic communications records and recordings, correspondence, documents and other tangible items produced to Plaintiff, publicly available documents, and anything else considered by or made available to Plaintiff.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 7 on the ground that it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 7 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the

possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 7 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 7, the Commission will produce such documents to Defendant.

8. Identify all persons with whom Plaintiff or any other Law Enforcement Officer has discussed any of the allegations asserted in the Complaint. For each person, identify the existence, custodian, location and general description of documents concerning the information that Plaintiff discussed with that person.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 8 on the ground that it is extremely overbroad and unduly burdensome. Subject to and without waiving any objections, in response to Interrogatory No. 8 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 8, the Commission will produce such documents to Defendant.

9. With respect to the allegations of the Complaint, state whether Plaintiff or any other Law Enforcement Officer has conducted interviews, depositions, or proffer sessions or otherwise obtained declarations or statements (the results of which are referred to, collectively, as “investigative testimonies”), from any persons having knowledge of any of the issues in this case or any related or parallel investigation or proceeding and, if so, with respect to each investigative testimony identify and/or describe: (a) the name of the witness; (b) the date the investigative testimony was taken; (c) the other persons present when the investigative testimony was taken; (d) how the investigative testimony was recorded; (e) whether the witness signed a record, recording or copy of the investigative testimony; (f) who took the investigative testimony; and (g) the identity and location of each custodian who has a copy of the investigative testimony.

Response

Subject to and without waiving any objections, in response to Interrogatory No. 9 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the

extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 9, the Commission will produce such documents to Defendant.

10. Identify the existence, custodian, location and general description of documents concerning each of the trades Plaintiff alleges were made based on material non-public information by Defendants Shankar, Goffer or Plate, or in any Schottenfeld Group accounts.

Response

The Commission further objects to Interrogatory No. 10 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 10 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 10, the Commission will produce such documents to Defendant.

11. Identify the existence, custodian, location and general description of documents concerning the method being used to calculate each of the Defendants' alleged profits with respect to the allegations set forth in the Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 11 on the ground that it is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 11 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 6 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has

non-privileged, relevant documents responsive to Interrogatory No. 11, the Commission will produce such documents to Defendant.

12. Identify the existence, custodian, location and general description of documents concerning all damages allegedly suffered as a result of each of Defendants' conduct as alleged in the Complaint, including, but not limited to, each element of damages, the amount of such damages, the methods by which such damages were calculated, all facts and assumptions used in making the calculations, and all documents necessary to calculate the damages.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 12 on the ground that it is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 12 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 12 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 12, the Commission will produce such documents to Defendant.

13. Identify the existence, custodian, location and general description of documents concerning the basis for your contention that any of the alleged unlawful trading is imputed or attributable to Schottenfeld Group, as alleged in paragraph 162 of the Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 13 on the ground that it is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 6 on the ground that it seeks information that may be derived or ascertained by reference to materials that are

already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 13 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 13, the Commission will produce such documents to Defendant.

14. With respect to the Claims for Relief at paragraphs 154-167 of the Complaint, identify the existence, custodian, location and general description of documents concerning the basis for your contention that Defendants Goffer, Plate, Shankar and Schottenfeld Group acted with scienter.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 14 on the ground that it is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 14 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 14 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 14, the Commission will produce such documents to Defendant.

15. Identify “CS-1,” as referred to in paragraph 7(j) and subsequent paragraphs of the complaint filed in United States v. Goffer et al., No. 09-MAG-2438, in the United States District Court for the Southern District of New York (the “Related Criminal Complaint”).

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 15 on the grounds that it seeks information that is legally

protected from disclosure by, among other things, the attorney-client privilege, the work product doctrine, the deliberative process privilege and the law enforcement privilege, and seeks information that is neither in the possession, custody or control of the Commission nor relevant to the subject matter of this action. Subject to and without waiving any objections, in response to Interrogatory No. 15, the Commission refers Defendant to its Initial and Supplemental Disclosures.

Subject to and without waiving any objections, the Commission will produce in response to Interrogatory No. 15 non-privileged documents that comprise its investigative files and that relate to the subject matter of this action.

16. Identify “CC-1,” as referred to in paragraph 10 and subsequent paragraphs of the Related Criminal Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 16 on the grounds that it seeks information that is legally protected from disclosure by, among other things, the attorney-client privilege, the work product doctrine, the deliberative process privilege and the law enforcement privilege, and seeks information that is neither in the possession, custody or control of the Commission nor relevant to the subject matter of this action. Subject to and without waiving any objections, in response to Interrogatory No. 16, the Commission refers Defendant to its Initial and Supplemental Disclosures.

Subject to and without waiving any objections, the Commission will produce in response to Interrogatory No. 16 non-privileged documents that comprise its investigative files and that relate to the subject matter of this action.

17. Identify “CC-2,” as referred to in paragraph 20(a) and subsequent paragraphs of the Related Criminal Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 17 on the grounds that it seeks information that is legally protected from disclosure by, among other things, the attorney-client privilege, the work product doctrine, the deliberative process privilege and the law enforcement privilege, and seeks information that is neither in the possession, custody or control of the Commission nor relevant to the subject matter of this action. Subject to and without waiving any objections, in response to Interrogatory No. 17, the Commission refers Defendant to its Initial and Supplemental Disclosures.

Subject to and without waiving any objections, the Commission will produce in response to Interrogatory No. 17 non-privileged documents that comprise its investigative files and that relate to the subject matter of this action.

18. Identify the existence, custodian, location and general description of relevant documents considered by, reviewed by or made available to Plaintiff or any other Law Enforcement Officer in its investigation of Shah, Khan, Goffer, Plate or Schottenfeld Group.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 18 on the ground that it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 18 on the ground that it seeks information that may be derived or ascertained by reference to materials that are legally protected from disclosure by, among other things, the attorney-client privilege, the work

product doctrine, the deliberative process privilege and the law enforcement privilege, and seeks information that is neither in the possession, custody or control of the Commission nor relevant to the subject matter of this action. Also, the Commission objects to the extent it seeks information already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 18 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 18, the Commission will produce such documents to Defendant.

19. Identify the existence, custodian, location and general description of documents that Plaintiff intends to offer in support of its case-in-chief.

Response

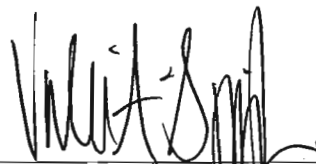
In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 19 on the ground that it is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 19 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant. Subject to and without waiving any objections, in response to Interrogatory No. 19 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 19, the Commission will produce such documents to Defendant.

20. Identify the existence, custodian, location and general description of all relevant documents obtained by Plaintiff or any other Law Enforcement Officer concerning the allegations of the Complaint.

Response

In addition to the grounds stated in the General Objections, the Commission objects to Interrogatory No. 20 on the ground that, by seeking the identification of “all” persons with knowledge on a broad set of allegations, it is extremely overbroad, unduly burdensome, and oppressive and is premature at this early stage of the litigation. The Commission further objects to Interrogatory No. 20 on the ground that it seeks information that may be derived or ascertained by reference to materials that are already in the possession, custody or control of Defendant, or that are legally protected from disclosure by, among other things, the attorney-client privilege, the work product doctrine, the deliberative process privilege and the law enforcement privilege, and seeks information that is neither in the possession, custody or control of the Commission nor relevant to the subject matter of this action. Subject to and without waiving any objections, in response to Interrogatory No. 20 the Commission refers Defendant to its Initial and Supplemental Disclosures. To the extent the Commission has non-privileged, relevant documents responsive to Interrogatory No. 20, the Commission will produce such documents to Defendant.

Dated: December 16, 2009
New York, New York



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