

Exhibit 2:

Public Engines' Responses to ReportSee's First Set of  
Document Requests (dated April 28, 2010)

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

PUBLIC ENGINES, INC., a Delaware  
Corporation,

Plaintiff,

vs.

REPORTSEE, INC., a Delaware  
Corporation,

Defendant.

**PLAINTIFF'S RESPONSE TO  
DEFENDANT'S FIRST SET OF  
DOCUMENT REQUESTS**

Case No. 2:10-cv-317

Honorable Tena Campbell

Pursuant to Rules 26, 33, and 34 of the Federal Rules of Civil Procedure, Plaintiff Public Engines, Inc. hereby submits its objections and responses to Defendant's First Set of Document Requests to Public Engines, Inc.

## GENERAL OBJECTIONS

1. Public Engines objects to Defendant's requests to the extent they seek to impose obligations different from or in addition to those imposed by the Federal Rules of Civil Procedure.

2. Public Engines objects to Defendant's requests to the extent they purport to require Public Engines to disclose information protected by the attorney-client privilege, work product or any other applicable privilege, protection, or rule.

3. Public Engines objects to Defendant's requests to the extent they seek information that is not relevant to the subject matter of the pending action, is immaterial, or is not reasonably calculated to lead to the discovery of admissible evidence.

4. Public Engines objects to the Defendant's requests to the extent they seek information that is not in the possession, custody, or control of Public Engines.

5. Public Engines objects to the Defendant's requests to the extent they are vague, ambiguous, overly broad, oppressive, unduly burdensome, vexatious, or intended to harass.

6. Public Engines objects to Defendant's requests to the extent they seek information which Defendant already possesses.

7. Public Engines further states that discovery is ongoing, and Public Engines reserves the right to supplement these responses.

8. In the event that Public Engines furnishes information coming within the scope of its objections, Public Engines does not waive any of its general or particular objections.

9. By agreeing to produce documents or categories of documents, Public Engines is agreeing to undertake a search that is reasonable under the circumstances, which include the

expedited nature of this discovery, and to produce documents that it has been able to locate based on this reasonable search.

### **REQUESTS FOR PRODUCTION OF DOCUMENTS**

**REQUEST NO. 1:** A document or documents that identifies all police or law enforcement agencies or departments that Public Engines considers to be its customers, whether or not such agencies have executed any contracts with Public Engines (hereinafter, Public Engines' "Clients" or each individually, a "Client").

**RESPONSE:** Public Engines agrees to produce documents sufficient to identify all police or law enforcement agencies or departments that Public Engines considers to be its customers.

**REQUEST NO. 2:** All documents that mention or concern Reportsee (including SpotCrime) and/or Colin Drane.

**RESPONSE:** Public Engines objects to this request as overbroad, vague, unduly burdensome, and not likely to lead to the discovery of admissible evidence. Without waiving these objections, documents responsive to this request are included in Public Engines' responses to Reportsee's other document requests including, without limitation, Request No. 3 below.

**REQUEST NO. 3:** All documents which relate to, describe, summarize or memorialize any communication between you and any other person that concern this Action or its subject matter.

**RESPONSE:** Public Engines objects to this request as overbroad, vague, and unduly burdensome. Subject to these objections, Public Engines agrees to produce communications between it and any third-party concerning this Action or its subject matter.

**REQUEST NO. 4:** All correspondence between Public Engines and any of its Clients which discuss or concern the terms of Public Engines' contract with each such Client, including

terms governing ownership and rights to data and De-Identified Data (as defined in your Complaint).

**RESPONSE:** Public Engines agrees to produce documents sufficient to show the contracts it has with its clients governing ownership and rights to data and De-Identified Data and communications with Clients, if any, concerning this subject.

**REQUEST NO. 5:** All correspondence with Clients or any third party concerning your website's Terms of Use.

**RESPONSE:** Public Engines agrees to produce documents responsive to this request.

**REQUEST NO. 6:** Documents that identify all sources of income that Public Engines receives, including the name of each source and amount(s) received.

**RESPONSE:** Public Engines objects that this request is overbroad, irrelevant, and not likely to lead to the discovery of admissible evidence. Subject to that objection, Public Engines agrees to produce documents sufficient to show its sources of income.

**REQUEST NO. 7:** All documents, including any contracts or agreements, which evidence any relationship between Public Engines and Trackle.com, a service of the Soruka Corporation.

**RESPONSE:** Public Engines objects that this request is irrelevant and not likely to lead to the discovery of admissible evidence. Subject to that objection, Public Engines agrees to produce contracts and correspondence sufficient to show its relationship with Trackle.com.

**REQUEST NO. 8:** Documents (including correspondence) that concern any complaints from any Clients to Public Engines that concern Reportsee or Drane, including documents that relate to the allegations in Paragraphs 34 and 42 of your Complaint.

**RESPONSE:** Public Engines objects that this request is duplicative of Request No. 3 and refers Reportsee to documents produced in response to Request No. 3. Subject to this objection, Public Engines agrees to produce documents responsive to this request.

**REQUEST NO. 9:** All documents that relate to or support your allegations that Reportsee has "scraped" or otherwise taken or misappropriated content, data, or other information from Public Engines' website(s) or that is owned by Public Engines.

**RESPONSE:** Public Engines agrees to produce documents responsive to this request.

**REQUEST NO. 10:** Documents, including correspondence or contracts, in which Public Engines grants to any person or business entity a right or license to use, download and/or display, any data (including De-Identified Data) from the Crime Reports website.

**RESPONSE:** Public Engines objects insofar as Reportsee is requesting it to produce documents that have no relation to the subject matter of this litigation and which is not calculated to lead to the discovery of admissible evidence. Public Engines further objects to the production of all correspondence and contracts to "any person or business entity" as such a request is unduly burdensome and overly broad. Subject to these objections, Public Engines agrees to produce documents sufficient to show its contracts for the use of data on the Crime Reports website and the identity of parties with whom it has such contracts.

**REQUEST NO. 11:** All documents that you intent to use as exhibits or otherwise intend to submit to the Court in connection with the pending Motion for Preliminary Injunction.

**RESPONSE:** Public Engines agrees to produce the exhibits it will use in connection with its pending motion for preliminary injunction.

DATED this 28th day of April, 2010.

Snell & Wilmer L.L.P.



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**CERTIFICATE OF SERVICE OF  
PLAINTIFF'S RESPONSE TO  
DEFENDANT'S FIRST SET OF  
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Case No. 2:10-cv-317

Honorable Tena Campbell

I certify that on the 28th day of April, 2010, a true and correct copy of **PLAINTIFF'S RESPONSE TO DEFENDANT'S FIRST SET OF DOCUMENT REQUESTS** as well as this **CERTIFICATE OF SERVICE** was served by electronic mail, via a FTP site, and United States mail on the following:

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