

Exhibit 2

1 Michael A. Sherman (SBN 94783)
 masherman@stubbsalderton.com
 2 Jeffrey F. Gersh (SBN 87124)
 jgersh@stubbsalderton.com
 3 Sandeep Seth (SBN 195914)
 sseth@stubbsalderton.com
 4 Wesley W. Monroe (SBN 149211)
 wmonroe@stubbsalderton.com
 5 Stanley H. Thompson (SBN 198825)
 sthompson@stubbsalderton.com
 6 Viviana Boero Hedrick (SBN 239359)
 vhedrick@stubbsalderton.com
 7 STUBBS ALDERTON & MARKILES, LLP
 15260 Ventura Blvd., 20th Floor
 8 Sherman Oaks, CA 91403
 Telephone: (818) 444-4500
 9 Facsimile: (818) 444-4520

10 Attorneys for PersonalWeb Technologies, LLC
 and Level 3 Communications, LLC
 11 [ADDITIONAL ATTORNEYS LISTED ON
 SIGNATURE PAGE]
 12

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN JOSE DIVISION

16 IN RE PERSONALWEB TECHNOLOGIES,
 LLC, ET AL., PATENT LITIGATION

CASE NO.: 5:18-md-02834-BLF

17 AMAZON.COM, INC. and AMAZON WEB
 18 SERVICES, INC.,

CASE NO.: 5:18-cv-00767-BLF

19 Plaintiffs,
 20 v.

**PERSONALWEB TECHNOLOGIES,
 LLC'S SECOND SET OF REQUESTS FOR
 21 ADMISION (Nos. 46-47) TO AMAZON
 WEB SERVICES, INC.**

22 PERSONALWEB TECHNOLOGIES, LLC, and
 LEVEL 3 COMMUNICATIONS, LLC,
 Defendants.

23 PERSONALWEB TECHNOLOGIES, LLC and
 LEVEL 3 COMMUNICATIONS, LLC,
 24 Counterclaimants,

25 v.

26 AMAZON.COM, INC. and AMAZON WEB
 SERVICES, INC.,
 27 Counterdefendants.
 28

1 Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure (“FRCP”), PersonalWeb
2 Technologies, LLC (“PersonalWeb”), by and through its attorneys, hereby submits its following
3 Second Set of Requests for Admission Nos. 46 to 47 (“Requests”) to Amazon Web Services, Inc.,
4 (“AWS”). AWS shall have thirty (30) days from the service of these Requests to respond. Per FRCP
5 26, these Requests shall be deemed to be continuing.

6 **INSTRUCTIONS**

7 In addition to the FRCP and the Local Rules of this Court, the following instructions apply:

- 8 1. For each Request that is denied, or is not admitted without qualification, AWS is to set
9 forth in detail the reason for such denial or qualification. If you deny a Request, the denial must fairly
10 meet the substance of the Request. If you qualify your answer or deny any part of the matter for which
11 an admission is requested, you shall admit so much of the statement as is true and deny the remainder.
- 12 2. If you object that a term or phrase is vague or ambiguous, you shall respond with your
13 understanding of the term or phrase and specifically admit or deny the statement.
- 14 3. These Requests are continuing in nature and require supplementation per the FRCP.

15 **REQUESTS FOR ADMISSION**

16 **REQUEST FOR ADMISSION 46**

17 Admit that AWS was not contractually obligated to indemnify website operator customers of
18 S3 for claims of patent infringement prior to June 28, 2017.

19 **REQUEST FOR ADMISSION 47**

20 Admit that, prior to June 28, 2017, no contractual obligation existed between AWS and its S3
21 customers requiring AWS to indemnify S3 customers for claims of patent infringement.

22 Dated: December 7, 2018

Respectfully submitted,

23 **STUBBS ALDERTON
& MARKILES, LLP**

24 By: /s/ Michael A. Sherman
25 Michael A. Sherman
26 Attorneys for Defendants and
27 Counterclaimants
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: December 7, 2018

MACEIKO IP

By: /s/ Theodore S. Maceiko
Theodore S. Maceiko (SBN 150211)
ted@maceikoip.com
MACEIKO IP
420 2nd Street
Manhattan Beach, CA 90266
Telephone: (310) 545-3311
Facsimile: (310) 545-3344

PROOF OF SERVICE

I declare as follows:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 15260 Ventura Blvd., 20th Floor, Sherman Oaks, California 91403. On **December 7, 2018**, I served the documents described as: **PERSONALWEB TECHNOLOGIES, LLC’S SECOND SET OF REQUESTS FOR ADMISSIONS (Nos. 46-47) TO AMAZON WEB SERVICES, INC.** on the interested parties in this action as follows:

Via Email

J. David Hadden
dhadden@fenwick.com
c/o Phillip John Haack
phaack@fenwick.com
c/o Saina Sason Shamilov
sshamilov@fenwick.com
c/o Ravi Ragavendra Ranganath
rranganath@fenwick.com
c/o Chieh Tung
ctung@fenwick.com
c/o Melanie Mayer
mmayer@fenwick.com
c/o Todd Gregorian
tgregorian@fenwick.com

NDCA Case No. 5:18-cv-00767-BLF

Attorney for Amazon.com, Inc. and Amazon Web Services, Inc. and numerous defendants (see Service List)

VIA MESSENGER: I caused the document(s) listed above to be delivered via messenger to the individual(s) as set forth above.

BY U.S. MAIL: (SEE ATTACHED SERVICE LIST) By depositing for collection and mailing in the ordinary course of business. I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. Postal Service on the same day with postage thereon fully prepaid at Sherman Oaks, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing on affidavit.

Pursuant to stipulation for email service reached with counsel of record, I served the above documents to the emails listed in the service caption above. A true and correct copy of the transmittal will be produced if requested by any party or the court.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct. Executed on **December 7, 2018**, at Sherman Oaks, California.

/s/ Elizabeth Saal de Casas
ELIZABETH SAAL DE CASAS

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.