

# Exhibit 1

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10 Counsel for AMAZON.COM, INC.,  
 11 AMAZON WEB SERVICES, INC., and  
 TWITCH INTERACTIVE, INC.

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

17 IN RE: PERSONAL WEB TECHNOLOGIES,  
 LLC ET AL., PATENT LITIGATION

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

20 Plaintiffs

v.

21 PERSONALWEB TECHNOLOGIES, LLC and  
 22 LEVEL 3 COMMUNICATIONS, LLC,

23 Defendants,

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

25 Plaintiffs,

v.

26 TWITCH INTERACTIVE, INC.,

27 Defendant.  
 28

Case No.: 5:18-md-02834-BLF

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

Case No.: 5:18-cv-05619-BLF

**AMAZON.COM, INC., AMAZON WEB  
 SERVICES, INC., AND TWITCH  
 INTERACTIVE INC.'S FIRST SET OF  
 INTERROGATORIES TO DEFENDANT  
 PERSONALWEB TECHNOLOGIES,  
 LLC PURSUANT TO FRCP 69 AND  
 CCP § 708.020**

1 **PROPOUNDING PARTY:** Amazon.com, Inc., Amazon Web Services, Inc.,  
and Twitch Interactive, Inc.

2 **RESPONDING PARTY:** PersonalWeb Technologies, LLC

3  
4 **SET NO:** One (Nos. 1–10)

5 In accordance with Rules 26, 33, and 69 of the Federal Rules of Civil Procedure, Civil  
6 Local Rule 33, and California Code of Civil Procedure § 708.020, Amazon.com, Inc., Amazon Web  
7 Services, Inc., and Twitch Interactive, Inc. request that PersonalWeb Technologies, LLC provide a  
8 written response to the following interrogatories at the offices of Fenwick & West LLP,  
9 555 California Street, Floor 12, San Francisco, California 94104, within thirty (30) days of service.

10 **DEFINITIONS**

11 1. The following definitions shall apply to each of the interrogatories. Terms without  
12 specific definition shall have their ordinary and usual meanings.

13 2. “Person” includes any individual, trust, estate, entity (including but not limited to  
14 sole proprietorship, partnership, joint venture, company, or corporation), organization, association,  
15 group, government, or governmental body (including but not limited to any governmental agent,  
16 representative, agency, bureau, department, committee, or commission).

17 3. “You,” “Your,” and “PersonalWeb” means PersonalWeb Technologies, LLC and  
18 its predecessors, parents, subsidiaries, divisions, officers, employees, agents, principals, beneficial  
19 owners, and attorneys, and each Person acting or purporting to act on its behalf or under its control.

20 4. “Document” means any items described in Federal Rule of Civil Procedure 34(a)  
21 and any “writings” within the meaning of Federal Rule of Evidence 1001, and all preliminary and  
22 final drafts of any such items.

23 5. The terms “Identify” or “Identity”:

24 a. when used with respect to a natural person, means to state the person’s full  
25 name, a present or former affiliation, if any, with You (including, but not limited to, the person’s  
26 title(s), and the period of time each person held each title), and present or last-known: (i) home and  
27 business address; (ii) employer or business affiliation; (iii) job title; and (iv) position or occupation;

28 b. when used with respect to business, legal, or governmental entity or

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1 association, means to state: (i) its name; (ii) its place or incorporation or organization; (iii) its  
2 principal place of business; and (iv) the identity of all persons affiliated with the organization who  
3 have knowledge of the matter with respect to which it is named in an interrogatory answer;

4 c. when referring to an account, the institution that maintains the account  
5 (including the address of the branch holding the account), the type of account (*e.g.*, Checking,  
6 Savings, Brokerage, or Retirement), the username, any associated payment account, the account  
7 holder name, account number, routing number, and current balance;

8 d. when referring to a fact or circumstance, means (i) the fact or circumstance,  
9 including the date the fact or circumstance occurred, and if the fact or circumstance was a  
10 communication, the content of and the parties to that communication; (ii) the documentary or  
11 testimonial evidence regarding that fact or circumstance; and (iii) the Persons with knowledge of  
12 the fact or circumstance;

13 e. when referring to a document, means to provide the bates number for that  
14 document, or, if no bates number is available, the (i) name of the document; (ii) general subject  
15 matter; (iii) date of the document; and (iv) name of the author(s), addressee(s) and recipient(s).

### 16 INSTRUCTIONS

17 1. In answering the following interrogatories, furnish all available information,  
18 including information in the possession, custody, or control of any of Your attorneys, directors,  
19 officers, agents, employees, representatives, associates, investigators or division affiliates,  
20 partnerships, parents or subsidiaries, and Persons under Your control, who have the best  
21 knowledge, not merely information of which You have personal knowledge.

22 2. If You cannot fully respond to the following interrogatories after exercising due  
23 diligence to secure the information requested thereby, so state, answer each such interrogatory to  
24 the fullest extent You deem possible, specify the portion of each interrogatory that You claim to be  
25 unable to answer fully, and completely state the facts upon which You rely to support Your  
26 contention that You are unable to answer the interrogatory fully and completely, and state what  
27 knowledge, information or belief You have concerning the unanswered portion of each such  
28 interrogatory.

1           3.     If You object to any portion or aspect of any interrogatory, provide all information  
2 responsive to the portion to which You do not object.

3           4.     If You are extracting and producing Documents from files and other sources in  
4 connection with these interrogatories, produce them in a manner that makes clear the source and  
5 preserves the order or location of the Documents within each source.

6           5.     If You are producing Documents in connection with these interrogatories, do not  
7 separate Documents attached to each other.

8           6.     If You are producing Documents in connection with these interrogatories, do so with  
9 control numbers permitting identification of particular documents by their assigned number.

10          7.     Should You seek to withhold any information based on some limitation of discovery  
11 (including, but not limited to, a claim of privilege) applicable to any communication or meeting,  
12 identify with particularity the circumstances of the communications or meeting.

13          8.     If Your response to a particular interrogatory is a statement that You lack the ability  
14 to comply with that interrogatory, You must specify whether the inability to comply is because the  
15 particular Document or item or category of information never existed, has been destroyed, has been  
16 lost, misplaced, or stolen, or has never been, or is no longer, in Your possession, custody, or control,  
17 in which case identify the name and address of any person or entity known or believed by You to  
18 have possession, custody, or control of that Document or item or category of information.

19          9.     If a Document once existed and has been lost or destroyed, or is otherwise missing,  
20 please identify the Document and state the details concerning the loss of such document.

21          10.    If You contend that you have previously produced any Document that provides  
22 information these interrogatories call for, identify the production number and file directory location  
23 of that Document.

24          11.    If, in answering these interrogatories, You claim there is any ambiguity in either a  
25 particular interrogatory or a definition or an instruction, you shall not use such a claim as a basis  
26 for refusing to respond, but shall instead set forth as part of Your response the language you deem  
27 ambiguous and the interpretation you used in responding to the particular interrogatory.

28          12.    Your obligation to respond to these interrogatories is continuing and You are to

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