

# **EXHIBIT 8**

## **ECA Chart**

JOINT CHART RE AMAZON'S MOTION TO COMPEL COMPLIANCE WITH COURT'S ORDER

AMAZON'S REQUESTS	CREDITORS' RESPONSES	AMAZON'S COMPROMISE	
<p><u>No. 10:</u> All documents relating to Your interests in any litigations, including intellectual property litigations, not included in the Collateral.</p>	<p><u>No. 10:</u> Europlay objects to this Request under FRCP 45(d)(1), (2)(ii) on the grounds that it is overly broad and vague, including with respect to the term "Your interests" and because that it is not on its face limited as to time and scope and including with respect to the term "relating to."</p> <p>Europlay further objects to this Request as exceedingly overbroad, burdensome and as calling for documents not relevant to PersonalWeb or Amazon's post-judgment collection efforts. As stated, Europlay is a litigation consultant, advisor and service firm and in the investment and fund management business and its personnel sit on numerous boards of directors, all for its numerous clients who have no relationship with PersonalWeb and Europlay is itself a party to a number of litigation cases. Many of such cases involve settlements or other resolutions that by agreement are subject to confidentiality clauses. Europlay further objects to this Request to the extent that production of the requested records violates the financial privacy rights of Europlay and/or its officers, directors, employees, and/or members. Europlay will not separately produce or log any documents relating to such matters but will meet and confer with Amazon to</p>	<p><u>No. 10:</u> Europlay should produce documents responsive to the full scope of this request as the Court ordered. But in the interest of compromise, Amazon offers to limit the request to:</p> <p>(i) documents created on or after January 1, 2010, a reasonable period before the founding of PersonalWeb; and</p> <p>(ii) documents to those sufficient to show Europlay's interests in litigation, including at least (a) identifying the litigation, all parties to it, and any other interested parties; and (b) identifying any payment or other benefit Europlay received as a result of the litigation.</p> <p>Amazon would reserve the right to seek further production as necessary based on this initial production. Europlay has three principals, one of whom, Mark Dyne, is related to Kevin Bermeister, and another, Murray Markiles, is a name partner at Stubbs Alderton Markiles, PersonalWeb's corporate and litigation counsel. How Mr. Markiles chose to set up PersonalWeb and structure ownership and investment by his law firm and others through both Europlay and SAM Ventures is key to establishing</p>	<p>No. 10: Europlay should produce documents responsive to the full scope of this request as the Court ordered. But in the interest of compromise, Amazon offers to limit the request to:</p> <p>(i) documents created on or after January 1, 2010, a reasonable period before the founding of PersonalWeb; and</p> <p>(ii) documents to those sufficient to show Europlay's interests in litigation, including at least (a) identifying the litigation, all parties to it, and any other interested parties; and (b) identifying any payment or other benefit Europlay received as a result of the litigation.</p> <p>Amazon would reserve the right to seek further production as necessary based on this initial production. Europlay has three principals, one of whom, Mark Dyne, is related to Kevin Bermeister, and another, Murray Markiles, is a name partner at Stubbs Alderton Markiles, PersonalWeb's corporate and litigation counsel. How Mr. Markiles chose to set up PersonalWeb and structure ownership and investment by his law firm and others through both Europlay and SAM Ventures is key to establishing</p>

<sup>1</sup> Europlay originally prepared this chart with the first, second, and fourth columns filled out and sent it to Amazon in June 23, 2022. On Saturday, August 13, 2022, Amazon sent Europlay a chart with the first, second, and fourth columns filled out and sent it to Amazon in June 23, 2022. On Saturday, August 13, 2022, Amazon sent Europlay a chart with the first, second, and fourth columns filled out and sent it to Amazon in June 23, 2022.

AMAZON'S REQUESTS	CREDITORS' RESPONSES	AMAZON'S COMPROMISE	
	<p>discuss the relevance, if any, of such matters.</p> <p>Europlay further objects to this Request to the extent that it seeks production of documents protected by the attorney-client privilege and/or the attorney work product doctrine and the joint interest privilege, and documents reflecting such counsel's mental impressions, conclusions, opinions, or legal theories. In this regard, Europlay is in the business of litigation support and consultation; thus with the exception of its role as a secured creditor of PersonalWeb, the vast majority of its communications regarding the subject of this Request are in the context of providing such services. Europlay will not separately produce or log any documents relating to such matters but will meet and confer with Amazon to discuss the relevance, if any, of such matters.</p> <p>Europlay further objects to this Request as exceedingly overbroad, burdensome and as calling for documents not relevant to PersonalWeb or Amazon's post-judgment collection efforts. As stated, Europlay is a litigation consultant, advisor and service firm that has numerous clients having no relationship with PersonalWeb and is itself a party to a number of litigation cases. Many of such cases involve settlements or other resolutions that by agreement are subject to confidentiality clauses.</p>	<p>the fraudulent nature of the receivership and alter ego. Europlay is not in any sense a "minor target" it is once of multiple entities through which Stubbs Alderton attorneys had a direct interest in the PersonalWeb litigation and directed and are responsible for its conduct.</p> <p>Europlay's objection based on its purported "limited interest" is baseless and also untimely as the Court has already ordered it to produce these materials. As for Europlay's objection based on "financial privacy," the documents can be given the highest designation under the Protective Order and, moreover, financial privacy is not a valid basis to withhold documents. <i>See Bentkowsky v. Benchmark Recovery, Inc.</i>, Civ. A. No. 13-cv-01252-VC (JCS), Dkt. No. 63 (N.D. Cal. July 10, 2014) (slip op.) (rejecting a party's claim of a financial privacy privilege and redaction of material, and ordering production subject to a protective order).</p>	<p>ma ava Eu Re bec me reg fur</p> <p><b><u>Eu</u></b> <b><u>Po</u></b></p> <p><i>Am</i> <i>wh</i> <i>Eu</i> <i>Re</i> <i>iss</i> <i>"C</i> <i>it c</i> <i>me</i> <i>to a</i> <i>for</i> <i>Su</i> <i>Eu</i> <i>reg</i> <i>top</i> <b><i>NC</i></b> <i>it s</i> <i>bor</i> <i>file</i> <i>the</i> <i>Pe</i> <i>Pe</i> <i>Re</i></p> <p><i>As</i> <i>Co</i> <i>of</i> <i>adv</i></p>

AMAZON'S REQUESTS	CREDITORS' RESPONSES	AMAZON'S COMPROMISE	
			<p><i>dis</i> <i>par</i> <i>inv</i> <i>sen</i> <i>"at</i> <i>to</i> <i>lea</i> <i>cus</i> <i>of</i> <i>wit</i> <i>Re.</i></p> <p><i>The</i> <i>Re.</i> <i>inv</i> <i>pri</i> <i>rel</i> <i>pri</i> <i>Ch</i> <i>thi.</i> <i>Eu</i> <i>adv</i> <i>are</i> <i>or</i> <i>thi.</i> <i>Am</i> <i>typ</i> <i>cas</i> <i>Am</i> <i>Eu</i> <i>con</i> <i>eve</i> <i>inv</i> <i>ass</i> <i>Pe</i> <i>Re.</i></p> <p><i>Am</i> <i>Ma</i></p>

AMAZON'S REQUESTS	CREDITORS' RESPONSES	AMAZON'S COMPROMISE	
			nan and Pe a r hov liti ser un Re. Am Mr Pe and oth SA the rec tha inq its log que ina Pe Ve the exp liti adv un Mo wit rec Eu rel oth "ex seq wh

# 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.