

Exhibit 2

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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

12
13 LYFT, INC.

14 Plaintiff,

15 v.

16 AGIS SOFTWARE DEVELOPMENT LLC,

17 Defendant.

Case No. 5:21-cv-04653-BLF

**PLAINTIFF LYFT, INC.'S
JURISDICTIONAL 30(B)(6) NOTICE TO
DEFENDANT AGIS SOFTWARE
DEVELOPMENT LLC**

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1 PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil
2 Procedure, counsel for Plaintiff Lyft, Inc. (“Lyft”), will take the video deposition of Defendant
3 AGIS Software Development LLC (“AGIS Software”).

4 The deposition will take place on March 4, 2022 beginning at 9:00 a.m. and continuing
5 thereafter until completed, remotely by video teleconference through web-based software, or at
6 another time mutually agreed to by the parties. The deposition shall be taken before a court reporter
7 or other person qualified to administer the oath and shall be recorded by videotape and stenographic
8 means.

9 Pursuant to Fed. R. Civ. P. 30(b)(6), AGIS Software is required to produce one or more
10 officers, directors, managing agents, or other persons who are designated and consent to testify on
11 its behalf as to each of the subject matters set forth below. The deposition will proceed in accordance
12 with the Federal Rules of Civil Procedure and the Court’s Order Granting Jurisdictional Discovery
13 (Dkt. No. 61), unless otherwise agreed. AGIS Software is requested to identify in writing to Lyft,
14 sufficiently in advance of the deposition, the one or more officers, directors, managing agents, or
15 other persons who consent to testify on AGIS Software’s behalf and the subject matters on which
16 each person will testify.

17 Pursuant to Rules 30(b)(2) and 34 of the Federal Rules of Civil Procedure, AGIS Software
18 is requested to produce all Documents and things relevant to the subject matter of the deposition
19 topics herein reasonably in advance of the deposition. “Documents and things” as used herein have
20 the same meaning as those terms do in Federal Rule of Civil Procedure 34.

21 DEFINITIONS

22 1. Preliminary Definitions: The present tense includes the past and future tenses. The
23 singular includes the plural, and the plural includes the singular. The terms “any” and “all” shall be
24 construed as “any and all.” “Including” means “including but not limited to.” The term “each”
25 shall be construed as “each and every.” Words in the masculine, feminine, or neuter form shall
26 include each of the other genders. The use of a verb in any tense shall be construed as the use of
27 the verb in all other tenses. The terms “and” and “or” are terms of inclusion and not of exclusion
28 and are to be construed either disjunctively or conjunctively as necessary to make the request

1 inclusive rather than exclusive. The use of the term “the” shall not be construed as limiting the
2 scope of any request.

3 2. “AGIS Software,” “Plaintiff,” “You,” or “Your” means plaintiff AGIS Software
4 Development LLC and includes, without limitation, (a) any of its divisions, departments, or other
5 organizational or operational units; (b) all of its predecessor or successor companies, corporations,
6 or other business entities, including its parents and affiliates (specifically including Advanced
7 Ground Information Systems, Inc. and AGIS Holdings, Inc.); (c) all present and former officers,
8 directors, employees, consultants, agents, attorneys, affiliates, or others acting or purporting to act
9 in whole or in part with any of the foregoing, directly or indirectly.

10 3. “Lyft” and “Defendant” mean defendant Lyft, Inc. as well as any agents, affiliates,
11 or other persons acting on Lyft’s behalf.

12 4. “Employee” means any officer, director, partner, employee, representative, or agent.

13 5. “Person” means any natural person, proprietorship, association, partnership, firm,
14 corporation, joint venture, government, or other legal entity, and shall include the owners, officers,
15 directors, agents, trustees, parents, subsidiaries, affiliates, assigns, predecessors, and successors of
16 such “Person.”

17 6. “Communication” means, without limitation, any transmittal of information in the
18 form of facts, ideas, inquiries or otherwise, whether written, oral, or visual, and whether in person
19 or by telephone, letter, or any other medium and any attachments thereto. A document or thing
20 transferred, whether temporarily or permanently, from one person to another shall be deemed to be
21 a communication between such persons whether or not such document or thing was prepared or
22 created by the transferor or addressed to the transferee.

23 7. “Document” shall have the broadest meaning permitted under the Federal Rules of
24 Civil Procedure and the Federal Rules of Evidence, and includes writings, recordings, photographs,
25 phonorecords, videos, drawings, charts, and other graphic matter that is or has been in AGIS
26 Software’s actual or constructive possession or control. “Document” includes any tangible
27 expression regardless of the manner or medium in which the record is produced, reproduced, or
28 stored, including without limitation any written, printed, typed, recorded, photographed,

1 photocopied, taped, graphic, or other matter, in whatever form and whether in final or draft form.
2 “Document” further includes electronically stored information, including without limitation
3 electronic mail, electronic information stored on computer drives, diskettes, tapes, CDs, or other
4 computer media, as well as any other information stored magnetically, electronically, optically, or
5 mechanically. A draft or non-identical copy is a separate document within the meaning of this term.
6 Any document bearing marks, including, without limitation, initials, stamped indicia, comments, or
7 notations not part of the original document or photographic reproduction thereof, is a separate
8 document.

9 8. “Thing” means all categories of tangible objects not included within the definition
10 of “Document.”

11 9. “Concerning,” “concern(s),” “referring to,” “relating to,” “related to,” “relate(s) to”,
12 “pertaining to,” or “pertain(s) to” shall mean identifying, referring to, concerning, evidencing,
13 demonstrating, summarizing, reflecting, constituting, containing, embodying, mentioning,
14 pertaining to, commenting on, connected with, discussing, describing, analyzing, showing,
15 comprising, illustrating, stating, dealing with, responding to, involving, recording, supporting,
16 negating, or relating to in any way relevant to a particular subject, in whole or in part, either directly
17 or indirectly.

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