

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ROBOCAST, INC.,	)	
	)	
Plaintiff and	)	
Counterclaim Defendant,	)	
	)	C.A. No. 22-305-JLH
v.	)	
	)	<b>JURY TRIAL DEMANDED</b>
NETFLIX, INC.,	)	
	)	
Defendant and	)	
Counterclaim Plaintiff.	)	

**DEFENDANT NETFLIX, INC.'S SECOND NOTICE OF  
DEPOSITION OF DAMON TORRES**

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30 and the Local Rules of the District of Delaware, Defendant and Counterclaim Plaintiff Netflix, Inc. (“Netflix”), by and through its counsel, will take the deposition upon oral examination of Damon Torres. The deposition will be conducted on May 2 and May 3, 2024 beginning at 9:00 a.m. Mountain Time at the Riverside Hotel, 2900 W Chinden Blvd, Boise, ID 83714, or at such other place and time upon which the parties may agree. The deposition will continue from day to day until completed, with weekends and holidays excepted.

The deposition will be taken before a court reporter, notary public, or other official authorized by law to administer oaths. The deposition will be recorded by videotape and/or stenographic means and will be taken for use at trial in this litigation, and for any purposes permitted under the Federal Rules of Civil Procedure and any other applicable rule or statute.

OF COUNSEL:

Tara D. Elliott (#4483)  
Rachel Weiner Cohen  
Ashley M. Fry  
Diane E. Ghrist  
Alessandra M. Schaszberger  
LATHAM & WATKINS LLP  
555 Eleventh Street, NW  
Suite 1000  
Washington, DC 20004-1304  
(202) 637-2200

Kimberly Q. Li  
LATHAM & WATKINS LLP  
200 Clarendon Street  
Boston, MA 02116  
(617) 880-4500

Dated: April 22, 2024

/s/ Sara M. Metzler

Kelly E. Farnan (#4395)  
Sara M. Metzler (#6509)  
RICHARDS, LAYTON & FINGER P.A.  
One Rodney Square  
920 North King Street  
Wilmington, DE 19801  
(302) 651-7700  
farnan@rlf.com  
metzler@rlf.com

*Attorneys for Defendant and Counterclaim  
Plaintiff Netflix, Inc.*