### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

RFCYBER CORP.,

Plaintiff,

Civil Action No. 2:20-cv-00274-JRG (Lead Case)

v.

GOOGLE LLC,

**Jury Trial Demanded** 

RFCYBER CORP.,

Plaintiff,

Defendant.

v.

SAMSUNG ELECTRONICS CO., LTD., and SAMSUNG ELECTRONICS AMERICA, INC.

Defendants.

Civil Action No. 2:20-cv-00335-JRG (Member Case)

**Jury Trial Demanded** 

### GOOGLE'S NOTICE OF INTENT TO SERVE SUBPOENAS ON SECURE TECHNOLOGY ALLIANCE

**PLEASE TAKE NOTICE** that, pursuant to Rules 30(b)(6) and 45 of the Federal Rules of Civil Procedure, Defendant Google LLC will cause the subpoenas attached hereto as Exhibit 1 to be served on third party Secure Technology Alliance.

The document subpoena requires Secure Technology Alliance to produce documents on or before July 23, 2021, at the offices of Munger, Tolles & Olson LLP, 350 South Grand Avenue, 50<sup>th</sup> Floor, Los Angeles, California 90071, or at such other time and place as may be mutually agreed upon by counsel.



The deposition upon oral examination of Secure Technology Alliance will occur on August 6, 2021, at 9:30 a.m. at the offices of Munger, Tolles & Olson LLP, 350 South Grand Avenue, 50<sup>th</sup> Floor, Los Angeles, California 90071, or at such other time and place as may be mutually agreed to by Google and STA. The deposition will be taken before a court reporter or other person authorized by law to administer oaths, and it will be recorded by video, audio, and/or stenographic means. You are invited to attend the deposition.

DATED: July 8, 2021

By: /s/ Heather E. Takahashi

HEATHER E. TAKAHASHI

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ATTORNEYS FOR DEFENDANT GOOGLE LLC



## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was served by email on counsel for all parties on July 8, 2021.

/s/ Heather E. Takahashi

By: Heather E. Takahashi



## EXHIBIT 1



## United States District Court

for the

	Eastern District	of Texas
RFCYBER CORP.  Plaintiff  v.  GOOGLE LLC  Defendant		Civil Action No. 2:20-cv-00274-JRG
SUBP	OENA TO PRODUCE DOCUMENTS TO PERMIT INSPECTION OF PR	
To: Secure Technology Alliance, 191 Clarksville Road, Princeton Junction, New Jersey 08550		oad, Princeton Junction, New Jersey 08550
documents, electronically material:  SEE SCHEDUL	y stored information, or objects, and to p	the time, date, and place set forth below the following ermit inspection, copying, testing, or sampling of the
Place: Munger, Tolles & Olson LLP 350 S. Grand Ave., 50th Fl. Los Angeles, CA 9007 Attn: Heather E. Takahashi		Date and Time: 07/23/2021 10:00 am
other property possessed	or controlled by you at the time, date, an	permit entry onto the designated premises, land, or nd location set forth below, so that the requesting party operty or any designated object or operation on it.
Place:		Date and Time:
Rule 45(d), relating to yo		ed – Rule 45(c), relating to the place of compliance; bpoena; and Rule 45(e) and (g), relating to your duty to oing so.
	CLERK OF COURT	OR /s/ Heather E. Takahashi
	Signature of Clerk or Deputy Clerk	Attorney's signature
The name, address, e-ma	il address, and telephone number of the	attorney representing (name of party) , who issues or requests this subpoena, are:
Heather E. Takahashi, 3	50 S. Grand Ave., 50th Fl., Los Angeles,	CA 90071 Heather.takahashi@mto.com 213-638-9531

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the



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