UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

| |) |
|---------------------------------|----------------------------|
| B.E. TECHNOLOGY, LLC, |) |
| Plaintiff, | The Honorable |
| , |) John Phipps McCalla |
| VS. | No.: 2:12-cv-02772-JPM-tmp |
| LINKEDIN CORPORATION, | JURY DEMAND |
| $\mathbf{p} \in \mathbb{R}^{d}$ |) GONT BENTH (B |
| Defendant. |) |
| | , |

DEFENDANT LINKEDIN CORPORATION'S NOTICE OF 30(b)(1) DEPOSITION OF YUICHIRO TSUTSUI

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(1) of the Federal Rules of Civil Procedure, Defendant LinkedIn Corporation ("LinkedIn") shall take the deposition of Yuichiro Tsutsui, 2725 West Wingman Avenue, Apt. 1165, Las Vegas, NV 89123 on November 20, 2013, beginning at 9:00 a.m. and continuing from day to day until completed.

The deposition will be held at Cameo Kayser & Associates, 2620 Regatta Drive, Suite 102, Las Vegas, Nevada 89128. The deposition will be conducted for the purposes of discovery, for use at trial, and for such other purposes as are permitted by law. The deposition will be taken before a person authorized to administer oaths under Rule 28 of the Federal Rules of Civil Procedure. The deposition shall be recorded by a stenographer or court reporter, and may be recorded by video and sound means.

You are invited to attend and cross-examine.



Dated: November 14, 2013

/s/ Glen G. Reid, Jr.

Glen G. Reid, Jr. (#8184)

greid@wyattfirm.com

Mark Vorder-Bruegge, Jr. (#06389) mvorder-bruegge@wyattfirm.com

WYATT, TARRANT & COMBS, LLP

The Renaissance Center 1715 Aaron Brenner Dr., Suite 800 Memphis, TN 38120-4367

Ph: 901.537-1000; Fax: 901.537.1010

-and-

J. David Hadden* dhadden@fenwick.com Darren E. Donnelly* ddonnelly@fenwick.com Saina S. Shamilov* sshamilov@fenwick.com Ryan J. Marton* rmarton@fenwick.com

Leslie Kramer*

lkramer@fenwick.com

Melissa H. Keyes*

mkeyes@fenwick.com

Clifford C. Webb*

cwebb@fenwick.com

Justin G. Hulse*

jhulse@fenwick.com

FENWICK & WEST LLP

801 California Street, 6th Floor Mountain View, CA 94041

Ph: 650.988-8500; Fax: 650.5200

*Admitted Pro Hac Vice

Counsel for Defendant

LINKEDIN CORPORATION



CERTIFICATE OF SERVICE

The undersigned declares as follows:

I am a citizen of the United States and employed in Santa Clara County, State of California I am over the age of eighteen years and not a party to the within-entitled action. My business address is Fenwick & West LLP, Silicon Valley Center, 801 California Street, Mountain View, California 94041. On the date set forth below, I served an electronic copy of the following document, initial **DEFENDANT LINKEDIN CORPORATION'S NOTICE OF 30(B)(1) DEPOSITION OF YUICHIRO TSUTSUI** via email on the following counsel of record in the subject action:

Robert E. Freitas
Craig R. Kaufman
James Lin
Qudus B. Olaniran
Freitas Tseng & Kaugman LLP
100 Marine Parkway, Suite 200
Redwood Shores, CA 94065
rfreitas@ftklaw.com
ckaufman@ftklaw.com
jlin@ftklaw.com
qolaniran@ftklaw.com

Richard M. Carter Adam C. Simpson Martin, Tate, Morrow & Marston, P.C. 6410 Poplar Avenue, Suite 1000 Memphis, TN 38119-4839 rcarter@martintate.com asimpson@martintate.com

Dated: November 14, 2013

/s/ Justin G. Hulse

Justin G. Hulse



UNITED STATES DISTRICT COURT

for the District of Nevada

| B.E. Technology, L.L.C., | | | | |
|---|---|--|--|--|
| Plaintiff) | Ciril Assista No. 2:42 av 02772 IDM tom | | | |
| v. | Civil Action No. 2:12-cv-02772-JPM-tmp | | | |
| LinkedIn Corporation, | (If the action is pending in another district, state where: | | | |
| Defendant) | Western District of Tennessee) | | | |
| | | | | |
| SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION | | | | |
| To: Yuichiro Tsutsui 2725 West Wingman Avenue, Apt. 1165, Las Veg | as, Nevada 89123 | | | |
| Testimony: YOU ARE COMMANDED to appear at the deposition to be taken in this civil action. If you are an organization one or more officers, directors, or managing agents, or designate about the following matters, or those set forth in an attachment: | on that is not a party in this case, you must designate | | | |
| Place: Cameo Kayser & Associates 2620 Regatta Drive, Suite 102 Las Vegas, NV 89128 | Date and Time: November 20, 2013 9:00 a.m. | | | |
| The deposition will be recorded by this method: Stend | ographic and Videotape | | | |
| | | | | |
| Please see | Exhibit A. | | | |
| The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached. | | | | |
| Date: November 14, 2013 CLERK OF COURT | OR JE JUL | | | |
| Signature of Clerk or Deputy Clerk | Attorney's signature Justin Hulse | | | |
| The name, address, e-mail, and telephone number of the attorney representing (name of party) LinkedIn Corporation | | | | |
| , who issues or requests this subpoena, are: | | | | |
| Justin Hulse | 2004 | | | |
| Fenwick & West LLP, 801 California Street, Mountain View, CA 94041 Telephone: 650.988.8500 Email: jhulse@fenwick.com | | | | |
| Telephone. 000.900.0000 Enfall. Judise@lenwick.com | | | | |



AO 88A (Rev. 06/09) Subpoena to Testify at a Deposition in a Civil Action (Page 2)

Civil Action No. 2:12-cv-02772-JMP-tmp

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

| | This subpoena fo | or (name of individual and title, if any) | Yuichiro Tsutsui |
|--|-------------------|---|--------------------------------------|
| was rec | | date) | |
| | | | ne named individual as follows: |
| | | | on (date); or |
| | I returned the | subpoena unexecuted because | |
| Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have als tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of \$ | | | |
| My fee | es are \$ | for travel and \$ | for services, for a total of \$ 0.00 |
| | I declare under p | penalty of perjury that this informat | ion is true. |
| Date: _ | | | Server's signature |
| | | | Printed name and title |
| | | | Server's address |

Additional information regarding attempted service, etc:



DOCKET

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.

