

[REDACTED]

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

TICKETMASTER, L.L.C., a Virginia
limited liability company,

Plaintiff,

v.

STUBHUB, INC., a Delaware corporation,
and DOES 1 through 30, inclusive,

Defendant.

Case No. BC369760
[REDACTED]

SUBPOENA DUCES TECUM

TO: Custodian of Records
TicketNews
c/o Ticket Network Forest, LLC
135 Bolton Road
Vernon, Connecticut 06066

BY AUTHORITY OF THE STATE OF CONNECTICUT, pursuant to Connecticut
General Statute § 52-148e(f); and in accordance with the attached Commission issued in
the case captioned *Ticketmaster, LLC v. StubHub, Inc.*, Case No. BC 369760, pending in
the Superior Court of the State of California, County of Los Angeles, you are hereby

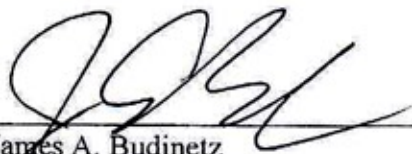
commanded to appear at a deposition to be conducted by counsel for StubHub, Inc., before a court reporter authorized to administer oaths and who is disinterested and an unrelated party, said deposition to take place at the offices of Pepe & Hazard LLP, Goodwin Square, 225 Asylum Street, Connecticut 06902 on **Tuesday, September 16, 2008, at 10:00 a.m.**

YOU ARE FURTHER COMMANDED TO PRODUCE, at the same time and place, all documents of any kind within your possession or control as set forth on the attached **Schedule A** to the Commission.

HEREOF FAIL NOT, under penalty of the law.

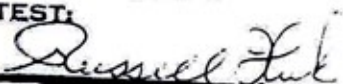
Dated at Hartford, Connecticut, this 25th day of August, 2008.

To any proper officer or indifferent person to serve and return.


James A. Budinetz
Commissioner of the Superior Court

PEPE & HAZARD LLP
225 Asylum Street
Hartford, CT 06103
Tel. 860.522.5175

241.2693 direct

A TRUE COPY
ATTEST:

INDIFFERENT PERSON

STATE OF CONNECTICUT)
) ss.
COUNTY OF)

August __, 2008

By virtue hereof, I have read the within Subpoena *Duces Tecum* in the presence and hearing of the within named witness, _____, and paid/tendered to said witness the fees allowed by law.

ATTEST:

State Marshal-Constable-
Indifferent Person

Witness fee: \$ _____
Service: \$ _____
Travel: \$ _____
Endorsement: \$ _____
Total: \$ _____

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9 Attorneys for Defendant
STUBHUB, INC.

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES

13 TICKETMASTER, L.L.C., a Virginia limited
14 liability company,

15 Plaintiff,

16 v.

17 STUBHUB, INC., a Delaware corporation,
and DOES 1 through 30, inclusive,

18 Defendant.

Case No. BC369760

COMMISSION TO ISSUE SUBPOENA FOR
OUT-OF STATE DEPOSITION AND
PRODUCTION OF DOCUMENTS OF
TICKETNEWS OR ITS PERSON MOST
KNOWLEDGEABLE

21 THE PEOPLE OF THE STATE OF CALIFORNIA TO:

22 THE STATE COURTS OF CONNECTICUT, COMMISSIONERS OF THE
23 SUPERIOR COURT AND/OR OTHER PERSONS AUTHORIZED BY LAW TO
24 ADMINISTER OATHS, CONDUCT DEPOSITIONS AND/OR ISSUE SUBPOENAS IN
25 THE STATE OF CONNECTICUT.

26 WHEREAS, it appears to our Superior Court of the State of California for the County of
27 Los Angeles that TicketNews, located at 137 Bolton Rd., Vernon, CT 06066 has information
28 directly relevant to the above-captioned action, which is now pending in the Superior Court for

1 the State of California, County of Los Angeles; and that it would further the interests of justice if
2 a subpoena to appear for deposition upon oral examination and/or to produce documents and/or
3 tangible things is issued by your jurisdiction, Cooley Godward Kronish LLP or any local
4 Connecticut counsel acting as a Commissioner of the Connecticut Superior Court that it
5 designates are hereby appointed as commissioners by this Court and authorized to proceed in
6 accordance with Connecticut law to issue or obtain issuance of process to compel TicketNews or
7 its persons most knowledgeable about this matter to appear for deposition upon oral examination
8 and/or to produce documents and/or tangible things.

9 By this Commission, the State Courts of Connecticut or a Commissioner of the
10 Connecticut Superior Court are hereby respectfully requested to issue a subpoena, in accordance
11 with Connecticut law, to compel TicketNews or its persons most knowledgeable to appear for
12 deposition upon oral examination and/or to produce documents and/or tangible things as set forth
13 in Attachment A hereto.

14 This Commission issued on AUG 21 2008 2008.

15 **JOHN A. CLARKE, CLERK**



16 *A. Hendrickson*
17 Clerk of the Superior Court for the State of
18 California in and for the County of Los Angeles

19 **A. HENDRICKSON**

1 formats, and digitized audio and voicemail, and includes each original and non-duplicate copy of
2 each such writing.

3 E. MEETING means the May 2008 meeting hosted by TicketsNow and
4 TICKETMASTER in Las Vegas, NV and referred to in YOUR June 12, 2008 article titled
5 "Ticketmaster/TicketsNow meeting analysis: a bright future for ticket brokers," a copy of which
6 is posted on your website at [http://www.ticketnews.com/Ticketmaster-TicketsNow-meeting-](http://www.ticketnews.com/Ticketmaster-TicketsNow-meeting-analysis-a-bright-future06812555)
7 [analysis-a-bright-future06812555](http://www.ticketnews.com/Ticketmaster-TicketsNow-meeting-analysis-a-bright-future06812555).

8 F. PERSON means any natural person and any other cognizable entity, including
9 (without limitation) corporations, proprietorships, partnerships, joint ventures, consortiums, clubs,
10 associations, foundations, governmental agencies or instrumentalities, societies and orders.

11 G. The terms RELATE, REFERRING, REGARDING, RELATING TO,
12 EVIDENCING, or CONSTITUTING are to be used in their broadest sense and shall mean to
13 refer to, discuss, involve, reflect, deal with, consist of, represent, constitute, emanate from, be
14 directed at, or in any way pertain, in full or in part, to the subject.

15 II. INSTRUCTIONS.

16 A. The original and each non-identical copy of each DOCUMENT or other tangible
17 thing requested herein that is in YOUR possession, custody, or control, or that of any of YOUR
18 agents, attorneys, accountants, employees, or representatives, is to be produced. If the original or
19 original carbon copy is not in YOUR possession, custody, or control, or that of YOUR agents,
20 attorneys, accountant, employees, or representatives, a full, clear, legible copy thereof is to be
21 produced.

22 B. Each Request shall be answered fully unless it is in good faith objected to, in
23 which event the reasons for YOUR objection shall be stated in detail. If any objection pertains to
24 only a portion of the Request, or a word, phrase, or clause contained within it, YOU are required
25 to state YOUR objection to that portion only and to respond to the remainder of the Request
26 using YOUR best efforts to do so.
27
28

1 DOCUMENT and/ or tangible thing;

2 3. The name and organizational position, if any, of each recipient and/or
3 custodian of the DOCUMENT and/or tangible thing;

4 4. The name and organizational position, if any, of each person (other than
5 stenographic or clerical assistants) participating in the preparation or creation of the
6 DOCUMENT and/or tangible thing;

7 5. The name and organizational position, if any, of each person to whom the
8 contents of the DOCUMENT and/or tangible thing or any portion thereof have heretofore been
9 communicated by copy, exhibition, reading or summarization;

10 6. A statement of the basis on which privilege is claimed with respect to each
11 DOCUMENT and/or tangible thing and whether or not its contents are limited solely to legal
12 advice or information provided for the purpose of securing legal advice;

13 7. The number of the request to which the DOCUMENT and/or tangible thing
14 is responsive; and

15 8. The identity and organizational position, if any, of each person supplying
16 the author of your response hereto with the information requested in subsections (1) through (7)
17 above.

18 **III. DOCUMENTS AND THINGS TO BE PRODUCED.**

19 **REQUEST NO. 1:**

20 All DOCUMENTS RELATING TO the MEETING including, but not limited to, YOUR
21 notes, memoranda, interview summaries or any other COMMUNICATIONS concerning the
22 MEETING.

23 **REQUEST NO. 2:**

24 All recordings of the MEETING including, but not limited to, dictation tapes, audio tapes,
25 video tapes, computer files or any other recordings concerning the MEETING.

26 **REQUEST NO. 3:**

27 All DOCUMENTS RELATING TO any written transcription of the MEETING.
28