

BRYANT BARNES & BLAIR, LLP
OPERATING ACCOUNT
P.O. BOX 224589
CHRISTIANSTED, VI 00822-4589
(340) 773-2785

BANK OF ST. CROIX, INC.
5025 ANCHOR WAY, GALLOWS BAY
CHRISTIANSTED, VI 00820
(340) 773-8500
101-669/216

1644

9/4/2012

PAY TO THE ORDER OF Jeffrey Epstein

\$**90.00

Ninety and 00/100*****

DOLLARS



Jeffrey Epstein

▲ TAMPER RESISTANT TONER AREA ▲

TWO SIGNATURES REQUIRED
IF OVER \$1000.00

[Handwritten Signature]



MEMO KGR v Ford service of subpoenas

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BRYANT BARNES & BLAIR, LLP

Jeffrey Epstein

9/4/2012

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NEW 7376 Operating KGR v Ford service of subpoenas

90.00

BRYANT BARNES & BLAIR, LLP
ATTORNEYS AT LAW

Britain H. Bryant, P.C.
Daryl C. Barnes, P.C.
Linda J. Blair

Sunshine S. Benoit
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www.bryantbarnes.com

September 4, 2012

Renix Charles
BEST MESSENGER SERVICE
394-353 Annas Retreat
St. Thomas, VI 00802

Re: KGR v. Ford

Dear Renix:

Enclosed for service upon Jeffrey Epstein, is a check in the amount of \$90.00, a Deposition Subpoena and a Subpoena to Produce Documents. Once you have completed the service, please return the proof of service along with your invoice to my attention. Thank you.

Regards,


Ruth Keene
Secretary to
Daryl C. Barnes, Esq.

rk/

Enclosures

EFTA01108512

UNITED STATES DISTRICT COURT

for the

District of the Virgin Islands

SUBPOENA IN A CIVIL CASE (TO PRODUCE DOCUMENTS)

KGR IP LLC,

Plaintiff,

v.

Ford Motor Company,

Defendant.

Pending in the UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA;
CASE NO. 11-05589 CW

TO: JEFFREY EPSTEIN, 6100 Red Hook Quarters, Suite B3, St. Thomas, VI 00802

YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case, to be recorded by stenographic means and videotaped

PLACE OF DEPOSITION	DATE AND TIME
---------------------	---------------

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects): **SEE SCHEDULE A**

PLACE Bryant Barnes & Blair, LLP 1134 King Street Second Floor Christiansted, Virgin Islands 00820 Telephone: (340) 773-2785	DATE AND TIME September 10, 2012 @ 10:00 a.m.
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YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
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Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE August 29, 2012
---	-------------------------

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Daryl C. Barnes, Esq.; Bryant Barnes & Blair; 1134 King St., 2nd Fl. Christiansted, VI 00820; 34.773.2785
(See Rule 45, Federal Rules of Civil Procedure, Subdivisions (c), (d), and (e), on the next page)

PROOF OF SERVICE

DATE PLACE

SERVED

SERVED ON (PRINT NAME) MANNER OF SERVICE

SERVED BY (PRINT NAME) TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____
DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rule of Civil Procedure, Subdivision (c), (d), and (e):

(c) Protecting a Person Subject to a Subpoena.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction-- which may include lost earnings and reasonable attorney's fees--on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises--or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) When Required. On timely motion, the issuing court must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person--except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information;

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or

(iii) a person who is neither a party nor a party's officer to incur substantial expense to travel more than 100 miles to attend trial.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(d) Duties in Responding to a Subpoena.

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery

of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

SCHEDULE A

DEFINITIONS

- A. "You" and/or "Your" shall mean Jeffrey Edward Epstein, as well as J. Epstein & Co., The Jeffrey Epstein Foundation, and/or the Florida Science Foundation, and/or all affiliated entities, predecessor entities, successor entities, employees, and agents.
- B. "KGR" shall mean KGR IP LLC, and all predecessors, successors in interest, assignees, subsidiaries, corporate parents, divisions, affiliates, and any entity having common ownership or control; and all directors, officers, employees, agents, representatives, and/or partners of the aforementioned entities.
- C. The "KGR Patent" shall mean U.S. Patent No. 6,639,614, which is entitled "MULTI-VARIATE DATA PRESENTATION METHOD USING ECOLOGICALLY VALID STIMULI."
- D. The "KGR Application" shall mean U.S. Patent Application No. 09/613,605, and any Related Patents or Related Applications.
- E. "Related Applications" shall mean any and all applications that claim the benefit of the filing date of the KGR Application, including but not limited to all continuation, continuation-in-part, divisional, reexamination, and reissue applications.
- F. "Related Patents" shall mean any and all patents that are related to, incorporate by reference, and/or claim the benefit of the filing date of the KGR Application, including but not limited to all continuation, continuation-in-part, divisional, reexamination, and reissue patents.
- G. "Patent Owner" shall mean the current owner(s) of the KGR Patent, all former owners of the KGR Patent, any person or entity that has ever held any right, title, or interest in or to the KGR Patent, anyone acting for or on behalf of any person or entity that has ever held any right, title, or interest in or to the KGR Patent, and anyone acting under express or implies license to the KGR Patent.
- H. "Communication(s)" shall mean any form of communication from one person or entity to another, including without limitation any oral or electronic communication, whether in person, by telephone, by facsimile, or otherwise.
- I. "Concerning" and "relating to" shall mean referring to, concerning, constituting, evidencing, summarizing, demonstrating, reflecting, studying, analyzing, considering, explaining, mentioning, showing, describing, commenting upon, or in any way relevant to the subject matter of the request.
- J. "Documents" shall be defined to the broadest extent permitted by law. Without limitation, "document" includes: papers, contracts, notes, memoranda,

correspondence, letters, statements, invoices, reports, data, studies, records, photographs, diaries, tapes, email and any and all other written, printed, recorded, or other tangible matter in your possession, custody or control, whether in paper or electronic form.

- K. "Person" shall mean any legal entity, including, without limitation, natural persons, public or private corporations, companies, limited liability companies, firms, joint ventures, proprietorships, partnerships, governmental bodies or agencies, associates, organizations, groups, trusts and estates. Any reference herein to a "person," whether or not a party herein, that is a corporation, partnership, or any entity other than an individual, shall be construed as including, without limitation, all past and present directors, officers, employees, agents, representatives, partners, and/or attorneys of the aforementioned entities.
- L. "Thing" shall mean any tangible object other than a document including without limitation objects of every kind and nature, as well as prototypes, models, drafts, compositions or specimens thereof.
- M. The words "and," "or" and "and/or" shall be construed conjunctively or disjunctively as is necessary to make the request inclusive rather than exclusive.

INSTRUCTIONS

- A. You are requested to produce all documents and things in the following categories that are in your possession, custody or control, in their entirety and without redaction or expurgation. "Possession, custody or control" shall be construed to the fullest extent provided under Federal Rules of Civil Procedure 34 and 45 and shall include, without limitation, those documents and things in the hands of any other Person that You have the ability to demand or gain access to in the ordinary course of business.

- B. If any document is withheld based upon a claim of privilege or other protection, provide for each such document: (i) the date of the document, (ii) the names of all authors, (iii) the names of all recipients, (iv) a description of the document, (v) an identification of the privilege or protection claimed, and (vi) a brief explanation of the basis of your claim of privilege or other protection.

- C. Documents shall not be withheld on the grounds that they contain highly sensitive or confidential information, but may be produced pursuant to the terms of a Stipulated Protective Order Regarding the Disclosure and Use of Discovery Materials entered in this case.

REQUESTS FOR PRODUCTION

1. All documents concerning the KGR Patent.
2. All documents concerning the prosecution of the KGR Patent before the United States Patent and Trademark Office and/or any foreign patent office(s).
3. All communications between You and Stephen Michael Kosslyn during the time period from January 1, 1998 to October 28, 2003.
4. All communications between You and Giorgio Ganis during the time period from January 1, 1998 to October 28, 2003.
5. All communications between You and [REDACTED] during the time period from January 1, 1998 to October 28, 2003.
6. All communications between You and Stephen Michael Kosslyn, Giorgio Ganis, and/or [REDACTED] during the time period from January 1, 1998 to October 28, 2003 regarding the development of methods of visualizing multivariate data using sounds or icons.
7. All communications between You and Stephen Michael Kosslyn, Giorgio Ganis, and/or [REDACTED] during the time period from January 1, 1998 to October 28, 2003 regarding the development of tools for financial analysis.
8. All communications between You and Stephen Michael Kosslyn, Giorgio Ganis, and/or [REDACTED] during the time period from January 1, 1998 to October 28, 2003 regarding the development of business ideas relating to research or work conducted by one or more of Stephen Michael Kosslyn, Giorgio Ganis, and [REDACTED].
9. All documents concerning the "Synthony" project.
10. All documents concerning the "Flower Market" project.
11. All documents concerning work performed or research conducted by Stephen Michael Kosslyn other than the "Synthony" project or the "Flower Market" project.
12. All documents referring or relating to the subject matter of the KGR Patent, including but not limited to methods for visualizing multivariate data using sounds or icons.
13. All communications between you and Stephen Michael Kosslyn, Giorgio Ganis, and/or [REDACTED] referring or relating to the subject matter of the KGR patent, including but not limited to methods for visualizing multivariate data using sounds or icons.

UNITED STATES DISTRICT COURT

for the

District of the Virgin Islands

SUBPOENA IN A CIVIL CASE (TO PRODUCE DOCUMENTS)

KGR IP LLC,

Plaintiff,

v.

Ford Motor Company,

Defendant.

Pending in the UNITED STATES DISTRICT COURT FOR THE NOTHERN DISTRICT OF CALIFORNIA;
CASE NO. 11-05589 CW

TO: JEFFREY EPSTEIN, 6100 Red Hook Quarters, Suite B3, St. Thomas, VI 00802

YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

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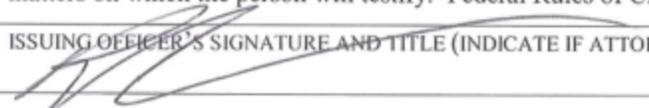
YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects): **SEE SCHEDULE A**

PLACE Bryant Barnes & Blair, LLP 1134 King Street Second Floor Christiansted, Virgin Islands 00820 Telephone: (340) 773-2785	DATE AND TIME September 10, 2012 @ 10:00 a.m.
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PREMISES	DATE AND TIME
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Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE
	August 29, 2012

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Daryl C. Barnes, Esq.; Bryant Barnes & Blair; 1134 King St., 2nd Fl. Christiansted, VI 00820; 34.773.2785
(See Rule 45, Federal Rules of Civil Procedure, Subdivisions (c), (d), and (e), on the next page)

PROOF OF SERVICE

DATE PLACE

SERVED

SERVED ON (PRINT NAME) MANNER OF SERVICE

SERVED BY (PRINT NAME) TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rule of Civil Procedure, Subdivision (c), (d), and (e):

(c) Protecting a Person Subject to a Subpoena.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction--which may include lost earnings and reasonable attorney's fees--on a party or attorney who fails to comply.

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(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or

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(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

SCHEDULE A

DEFINITIONS

- A. "You" and/or "Your" shall mean Jeffrey Edward Epstein, as well as J. Epstein & Co., The Jeffrey Epstein Foundation, and/or the Florida Science Foundation, and/or all affiliated entities, predecessor entities, successor entities, employees, and agents.
- B. "KGR" shall mean KGR IP LLC, and all predecessors, successors in interest, assignees, subsidiaries, corporate parents, divisions, affiliates, and any entity having common ownership or control; and all directors, officers, employees, agents, representatives, and/or partners of the aforementioned entities.
- C. The "KGR Patent" shall mean U.S. Patent No. 6,639,614, which is entitled "MULTI-VARIATE DATA PRESENTATION METHOD USING ECOLOGICALLY VALID STIMULI."
- D. The "KGR Application" shall mean U.S. Patent Application No. 09/613,605, and any Related Patents or Related Applications.
- E. "Related Applications" shall mean any and all applications that claim the benefit of the filing date of the KGR Application, including but not limited to all continuation, continuation-in-part, divisional, reexamination, and reissue applications.
- F. "Related Patents" shall mean any and all patents that are related to, incorporate by reference, and/or claim the benefit of the filing date of the KGR Application, including but not limited to all continuation, continuation-in-part, divisional, reexamination, and reissue patents.
- G. "Patent Owner" shall mean the current owner(s) of the KGR Patent, all former owners of the KGR Patent, any person or entity that has ever held any right, title, or interest in or to the KGR Patent, anyone acting for or on behalf of any person or entity that has ever held any right, title, or interest in or to the KGR Patent, and anyone acting under express or implied license to the KGR Patent.
- H. "Communication(s)" shall mean any form of communication from one person or entity to another, including without limitation any oral or electronic communication, whether in person, by telephone, by facsimile, or otherwise.
- I. "Concerning" and "relating to" shall mean referring to, concerning, constituting, evidencing, summarizing, demonstrating, reflecting, studying, analyzing, considering, explaining, mentioning, showing, describing, commenting upon, or in any way relevant to the subject matter of the request.
- J. "Documents" shall be defined to the broadest extent permitted by law. Without limitation, "document" includes: papers, contracts, notes, memoranda,

correspondence, letters, statements, invoices, reports, data, studies, records, photographs, diaries, tapes, email and any and all other written, printed, recorded, or other tangible matter in your possession, custody or control, whether in paper or electronic form.

- K. "Person" shall mean any legal entity, including, without limitation, natural persons, public or private corporations, companies, limited liability companies, firms, joint ventures, proprietorships, partnerships, governmental bodies or agencies, associates, organizations, groups, trusts and estates. Any reference herein to a "person," whether or not a party herein, that is a corporation, partnership, or any entity other than an individual, shall be construed as including, without limitation, all past and present directors, officers, employees, agents, representatives, partners, and/or attorneys of the aforementioned entities.
- L. "Thing" shall mean any tangible object other than a document including without limitation objects of every kind and nature, as well as prototypes, models, drafts, compositions or specimens thereof.
- M. The words "and," "or" and "and/or" shall be construed conjunctively or disjunctively as is necessary to make the request inclusive rather than exclusive.

INSTRUCTIONS

- A. You are requested to produce all documents and things in the following categories that are in your possession, custody or control, in their entirety and without redaction or expurgation. "Possession, custody or control" shall be construed to the fullest extent provided under Federal Rules of Civil Procedure 34 and 45 and shall include, without limitation, those documents and things in the hands of any other Person that You have the ability to demand or gain access to in the ordinary course of business.

- B. If any document is withheld based upon a claim of privilege or other protection, provide for each such document: (i) the date of the document, (ii) the names of all authors, (iii) the names of all recipients, (iv) a description of the document, (v) an identification of the privilege or protection claimed, and (vi) a brief explanation of the basis of your claim of privilege or other protection.

- C. Documents shall not be withheld on the grounds that they contain highly sensitive or confidential information, but may be produced pursuant to the terms of a Stipulated Protective Order Regarding the Disclosure and Use of Discovery Materials entered in this case.

REQUESTS FOR PRODUCTION

1. All documents concerning the KGR Patent.
2. All documents concerning the prosecution of the KGR Patent before the United States Patent and Trademark Office and/or any foreign patent office(s).
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4. All communications between You and Giorgio Ganis during the time period from January 1, 1998 to October 28, 2003.
5. All communications between You and [REDACTED] during the time period from January 1, 1998 to October 28, 2003.
6. All communications between You and Stephen Michael Kosslyn, Giorgio Ganis, and/or [REDACTED] during the time period from January 1, 1998 to October 28, 2003 regarding the development of methods of visualizing multivariate data using sounds or icons.
7. All communications between You and Stephen Michael Kosslyn, Giorgio Ganis, and/or [REDACTED] during the time period from January 1, 1998 to October 28, 2003 regarding the development of tools for financial analysis.
8. All communications between You and Stephen Michael Kosslyn, Giorgio Ganis, and/or [REDACTED] during the time period from January 1, 1998 to October 28, 2003 regarding the development of business ideas relating to research or work conducted by one or more of Stephen Michael Kosslyn, Giorgio Ganis, and [REDACTED].
9. All documents concerning the "Synthony" project.
10. All documents concerning the "Flower Market" project.
11. All documents concerning work performed or research conducted by Stephen Michael Kosslyn other than the "Synthony" project or the "Flower Market" project.
12. All documents referring or relating to the subject matter of the KGR Patent, including but not limited to methods for visualizing multivariate data using sounds or icons.
13. All communications between you and Stephen Michael Kosslyn, Giorgio Ganis, and/or [REDACTED] referring or relating to the subject matter of the KGR patent, including but not limited to methods for visualizing multivariate data using sounds or icons.

14. All documents relating to the conception, reduction to practice, diligence in reducing to practice, testing, modification, and/or experimental use of any of the subject matter claimed in the KGR Patent, including but not limited to methods of visualizing multivariate data using sounds or icons.
15. All communications between You and KGR or any agent of KGR.
16. All documents concerning KGR.
17. All documents concerning any monies or other material support contributed by You to any research or to any product, system or method developed by Stephen Michael Kosslyn, Giorgio Ganis, and/or [REDACTED].
18. All documents concerning any assignment of or other transfer of interest in the KGR Patent.
19. All documents concerning any agreements (including but not limited to the agreements themselves) between You and Stephen Michael Kosslyn and/or Giorgio Ganis and/or [REDACTED] and/or KGR.
20. All communications between You and anyone else concerning the subject matter of the KGR Patent and/or the alleged invention claimed by the KGR Patent.
21. All documents concerning any efforts that You or others made to market, license, and/or sell the alleged invention claimed by the KGR Patent.
22. All documents concerning any efforts that You made to solicit funding or monetary support on behalf of Stephen Michael Kosslyn, Giorgio Ganis, and/ or [REDACTED] [REDACTED] during the time period from January 1, 1998 to October 28, 2003.
23. All documents concerning the first offer for sale of any product covered by the KGR Patent.
24. All documents relating to any symposium, speech, presentation, convention, seminar, paper, publication or article related, in whole or in part, to any of the subject matter disclosed and/or claimed by the KGR Patent.
25. All documents and/or communications concerning the inventorship of the KGR Patent.
26. All documents concerning any contribution made by You to the conception and/or reduction to practice of the subject matter of the KGR Patent or the alleged invention purportedly claimed in the KGR Patent, including but not limited to any alleged inventions directed to methods of visualizing multivariate data using sounds or icons.

27. All documents concerning whether You should properly be named as an inventor on the KGR Patent.
28. All documents concerning the lawsuit-at-issue, namely *KGR IP LLC v. Ford Motor Company*, pending in the Northern District of California (Case No. 11-05589 CW).
29. All communications between You and any member of the law firm of Brown Rudnick Berlack Israels LLP concerning the KGR Patent or any of the subject matter disclosed and/or claimed by the KGR Patent.
30. Documents sufficient to evidence any payments made to You by Stephen Michael Kosslyn and/or Giorgio Ganis and/or [REDACTED] and/or KGR.
31. Any notes that reflect discussions regarding or ideas regarding the claimed subject matter of the KGR Patent, including but not limited to methods of visualizing multivariate data using sounds or icons.