

1 REHM & ROGARI
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3 Tel: (310) 207-0059
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4 Attorneys for Plaintiff
5 David Max

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7 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
8 **FOR THE COUNTY OF ORANGE**
9

10 David Max,

11 Plaintiff,

12 vs.

13 Eric Park, Tal Golan. Information
Superbrand, Inc., SportsPedia, Inc.,
14 TravePedia, Inc., Autopedia, Inc.
Does 1 through 100, inclusive.

15 Defendants.
16

NO: 30-2010-00357210

DEMAND TO PRODUCE
DOCUMENTS

17 Demanding Party: Plaintiff DAVID MAX

18 Responding Party: Defendant INFORMATION SUPERBRAND, INC.

19 Set Number: 1
20

21 PLEASE TAKE NOTICE THAT Plaintiff DAVID MAX, pursuant to
22 California Code of Civil Procedure section 2031.010 et. set. requests that
23 Defendant INFORMATION SUPERBRAND, INC. produce for inspection and
24 copying, on June 29, 2010, at 10:00 a.m. at 12121 Wilshire Blvd., Suite 600, Los
25 Angeles, CA, the documents set forth in this notice.
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1 **DEFINITIONS**

2 When used in this request, the following terms shall mean:

3 “WRITING” means and refers to writing as defined in section 250 of the
4 Evidence code.

5 “COMPLAINT” means and refers to the complaint for damages filed by plaintiff
6 David Max.

7 “CROSS-COMPLAINT” means and refers to the cross-complaint for damages
8 filed by defendants Eric Park, Information Superbrand, Inc., SportsPedia, Inc.
9 and TravelPedia, Inc.
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1 **DOCUMENTS OR CATEGORIES OF DOCUMENTS**

- 2 1. All insurance policies, including declaration pages, identified in your
3 response to Form Interrogatory 4.1, or which may cover any damages
4 sustained by plaintiff as alleged in the complaint.
- 5 2. Any and all writings relating to any reservation of rights or coverage
6 dispute for any insurance policy identified in your response to Form
7 Interrogatory 4.1.
- 8 3. Any and all writings responsive to, or identified in your response to Form
9 Interrogatory 12.3.
- 10 4. Any and all writings responsive to, or identified in your response to Form
11 Interrogatory 12.4.
- 12 5. Any and all writings responsive to, or identified in your response to Form
13 Interrogatory 12.5.
- 14 6. Any and all writings responsive to, or identified in your response to Form
15 Interrogatory 12.6.
- 16 7. Any and all writings responsive to, or relating to any inspection identified
17 in your response to Form Interrogatory 12.7.
- 18 8. Any and all writings responsive to, or identified in your response to Form
19 Interrogatory 13.2.
- 20 9. Any and all writings responsive to, or identified in your response to Form
21 Interrogatory 14.2.
- 22 10. Any and all writings responsive to, or identified in your response to Form
23 Interrogatory 15.1(c).
- 24 11. Any and all writings responsive to, or identified in your response to Form
25 Interrogatory 17.1(d).
- 26 12. Any and all writings responsive to, or identified in your response to Form
27 Interrogatory 50.1.
- 28 13. Any and all writings responsive to, or identified in your response to
 Special Interrogatory 2.
14. Any and all writings responsive to, or identified in your response to
 Special Interrogatory 5.
15. Any and all writings responsive to, or identified in your response to
 Special Interrogatory 8.
16. Any and all writings responsive to, or identified in your response to
 Special Interrogatory 11.
17. Any and all writings responsive to, or identified in your response to
 Special Interrogatory 14.

- 1 18. Any and all writings responsive to, or identified in your response to
Special Interrogatory 17.
- 2 19. Any and all writings responsive to, or identified in your response to
3 Special Interrogatory 20.
- 4 20. Any and all writings responsive to, or identified in your response to
5 Special Interrogatory 23.
- 6 21. Any and all writings responsive to, or identified in your response to
Special Interrogatory 26.
- 7 22. Any and all writings responsive to, or identified in your response to
8 Special Interrogatory 29.
- 9 23. Any and all writings responsive to, or identified in your response to
Special Interrogatory 32.
- 10 24. Any and all writings responsive to, or identified in your response to
11 Special Interrogatory 35.
- 12 25. Any and all writings responsive to, or identified in your response to
Special Interrogatory 38.
- 13 26. Any and all writings responsive to, or identified in your response to
14 Special Interrogatory 41.
- 15 27. Any and all writings responsive to, or identified in your response to
Special Interrogatory 44.
- 16 28. Any and all writings responsive to, or identified in your response to
17 Special Interrogatory 47.
- 18 29. Any and all writings responsive to, or identified in your response to
Special Interrogatory 50.
- 19 30. Any and all writings responsive to, or identified in your response to
20 Special Interrogatory 53.
- 21 31. Any and all writings responsive to, or identified in your response to
Special Interrogatory 56.
- 22 32. Any and all writings responsive to, or identified in your response to
23 Special Interrogatory 59.
- 24 33. Any and all writings responsive to, or identified in your response to
Special Interrogatory 64.
- 25 34. Any and all writings responsive to, or identified in your response to
26 Special Interrogatory 67.
- 27 35. Any and all writings responsive to, or identified in your response to
Special Interrogatory 70.
- 28 36. Any and all writings responsive to, or identified in your response to

- 1 Special Interrogatory 73.
- 2 37. Any and all writings responsive to, or identified in your response to
3 Special Interrogatory 76.
- 4 38. Any and all writings responsive to, or identified in your response to
5 Special Interrogatory 79.
- 6 39. Any and all writings responsive to, or identified in your response to
7 Special Interrogatory 82.
- 8 40. Any and all writings responsive to, or identified in your response to
9 Special Interrogatory 85.
- 10 41. Any and all writings responsive to, or identified in your response to
11 Special Interrogatory 82.
- 12 42. Any and all writings responsive to, or identified in your response to
13 Special Interrogatory 85.
- 14 43. Any and all writings responsive to, or identified in your response to
15 Special Interrogatory 88.
- 16 44. Any and all writings responsive to, or identified in your response to
17 Special Interrogatory 91.
- 18 45. Any and all writings responsive to, or identified in your response to
19 Special Interrogatory 94.
- 20 46. Any and all writings responsive to, or identified in your response to
21 Special Interrogatory 97.
- 22 47. Any and all writings responsive to, or identified in your response to
23 Special Interrogatory 100.
- 24 48. Any and all writings responsive to, or identified in your response to
25 Special Interrogatory 103.
- 26 49. Any and all writings responsive to, or identified in your response to
27 Special Interrogatory 106.
- 28 50. Any and all writings responsive to, or identified in your response to
Special Interrogatory 109.
51. Any and all writings responsive to, or identified in your response to
Special Interrogatory 112.
52. Any and all writings responsive to, or identified in your response to
Special Interrogatory 115.
53. Any and all writings responsive to, or identified in your response to
Special Interrogatory 118.
54. Any and all writings responsive to, or identified in your response to
Special Interrogatory 121.

- 1 55. Any and all writings responsive to, or identified in your response to
Special Interrogatory 124.
- 2 56. Any and all writings responsive to, or identified in your response to
3 Special Interrogatory 127.
- 4 57. Any and all writings responsive to, or identified in your response to
Special Interrogatory 130.
- 5 58. Any and all writings responsive to, or identified in your response to
6 Special Interrogatory 133.
- 7 59. Any and all writings responsive to, or identified in your response to
Special Interrogatory 136.
- 8 60. Any and all writings responsive to, or identified in your response to
9 Special Interrogatory 139.
- 10 61. Any and all writings responsive to, or identified in your response to
Special Interrogatory 142.
- 11 62. Any and all writings responsive to, or identified in your response to
12 Special Interrogatory 145.
- 13 63. Any and all writings responsive to, or identified in your response to
Special Interrogatory 149.
- 14 64. Any and all writings responsive to, or identified in your response to
15 Special Interrogatory 152.
- 16 65. Any and all minutes of any Board of Director meeting of SPORTSPEDIA,
INC. from March 1, 2000 through June 1, 2010.
- 17 66. Any and all minutes of any Board of Director meeting of TRAVELPEDIA,
18 INC. from March 1, 2000 through June 1, 2010.
- 19 67. Any and all minutes of any Board of Director meeting of
20 IINFORMATION SUPERBRAND, INC. from March 1, 2000 through
June 1, 2010.
- 21 68. Any and all minutes of any Board of Director meeting of AUTOPEdia,
INC. from March 1, 2000 through June 1, 2010.
- 22 69. Any and all WRITINGS reflecting all current domain names owned by
23 Information Superbrand, Inc.
- 24 70. Any and all WRITINGS reflecting all trademarks currently owned by
Information Superbrand, Inc.
- 25 71. Any and all WRITINGS reflecting all Information Superbrand, Inc.
26 creditors and amount owed to each.
- 27 72. Any and all tax returns of SPORTSPEDIA, INC. from March 1, 2000
28 through June 1, 2010.

- 1 73. Any and all tax returns of TRAVELPEDIA, INC. from March 1, 2000
through June 1, 2010.
- 2
- 3 74. Any and all tax returns of IINFORMATION SUPERBRAND, INC. from
March 1, 2000 through June 1, 2010.
- 4 75. Any and all tax returns of AUTOPEDIA, INC. from March 1, 2000
through June 1, 2010.
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7 DATED: May 24, 2010

REHM & ROGARI

Ralph Rogari, Attorneys for
plaintiff David Max

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**PROOF OF SERVICE
BY MAIL**

STATE OF CALIFORNIA)
)
COUNTY OF LOS ANGELES)

I am over the age of 18 and not a party to this action. My business address is 12121 Wilshire Boulevard, Suite 600, Los Angeles, California 90025.

On May 24, 2010, I served the within Plaintiff's Notice to Produce Documents on the interested parties by placing a true copy in a sealed envelope, addressed as follows:

John Dean
2678 Raven Circle
Corona. CA 92882

I deposited the envelope with first class postage affixed in the U.S. Mail at Los Angeles, California.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. postal service on that same day with first class postage prepaid at Los Angeles, CA. I am aware that service is presumed invalid if postal cancellation date or postal meter date is more than one day after date of deposit for mailing as stated in this affidavit.

Executed this 24th day of May, 2010 at Los Angeles, California.

I declare under penalty of perjury the foregoing is true and correct under the laws of the State of California.

RALPH ROGARI