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

9
10 David Max,) NO: 30-2010-00357210
11 Plaintiff,) SPECIAL INTERROGATORIES
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

17 Propounding Party: Plaintiff DAVID MAX
18 Responding Party: Defendant AUTOPEdia, INC.
19 Set Number: 1
20

21 Pursuant to Code of Civil Procedure section 2030.010 et. set. Plaintiff,
22 David Max, requests that Defendant AutoPedia, Inc. answer the following
23 interrogatories:
24

25 DATED: May 24, 2010

26 REHM & ROGARI
27 
28 _____
Ralph Rogari
Attorneys for plaintiff David Max

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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SPECIAL INTERROGATORIES

1. Please state all facts that support your contention that: “ In or about 1996, Cross-Complainant ERIC PARK formed the company known as Defendant AUTOPEDIA, INC., the purpose of which was to implement a collaborative consumer network on the Internet in major consumer categories. The goal was to provide a natural destination consumer aggregation point, where consumers could find useful information that is more highly targeted than a search destination point, and where consumers could access ultimate transaction points which generate revenue, including transaction-based revenue.”

2. Please identify all WRITINGS supporting your contention that: “ In or about 1996, Cross-Complainant ERIC PARK formed the company known as Defendant AUTOPEDIA, INC., the purpose of which was to implement a collaborative consumer network on the Internet in major consumer categories. The goal was to provide a natural destination consumer aggregation point, where consumers could find useful information that is more highly targeted than a search destination point, and where consumers could access ultimate transaction points which generate revenue, including transaction-based revenue.”

3. Please identify all witnesses with knowledge of any fact supporting your contention that: “In or about 1996, Cross-Complainant ERIC PARK formed the company known as Defendant AUTOPEDIA, INC., the purpose of which was to implement a collaborative consumer network on the Internet in major consumer categories. The goal was to provide a natural destination consumer aggregation point, where consumers could find useful information that is more highly targeted than a search destination point, and where consumers could access ultimate transaction points which generate revenue, including transaction-based revenue.”

4. Please state all facts that support your contention that: “Defendant AUTOPEDIA, INC., owned and operated various websites including www.autopedia.com, which were comprised of the coined term formed by the word "pedia" combined with a term that is descriptive of the services, such as the subject matter of the information services.”

5. Please identify all WRITINGS supporting your contention that: “Defendant AUTOPEdia, INC., owned and operated various websites including www.autopedia.com, which were comprised of the coined term formed by the word "pedia" combined with a term that is descriptive of the services, such as the subject matter of the information services.”
6. Please identify all witnesses with knowledge of any fact supporting your contention that: “Defendant AUTOPEdia, INC., owned and operated various websites including www.autopedia.com, which were comprised of the coined term formed by the word "pedia" combined with a term that is descriptive of the services, such as the subject matter of the information services.”
7. Please state all facts that support your contention that: “In or about 1998, Cross-Complainant ERIC PARK was solicited by Cross-Defendant DAVID MAX, whereby Cross-Defendant DAVID MAX proposed that he would act as a promoter of Defendant AUTOPEdia, INC., obtain and raise shareholders, monies, funding, business deals, and strategic transactions for the benefit of Cross-Complainant ERIC PARK and Defendant AUTOPEdia, INC.”
8. Please identify all WRITINGS that support your contention that: “In or about 1998, Cross-Complainant ERIC PARK was solicited by Cross-Defendant DAVID MAX, whereby Cross-Defendant DAVID MAX proposed that he would act as a promoter of Defendant AUTOPEdia, INC., obtain and raise shareholders, monies, funding, business deals, and strategic transactions for the benefit of Cross-Complainant ERIC PARK and Defendant AUTOPEdia, INC.”
9. Please identify all witnesses with knowledge of any fact supporting your contention that: “In or about 1998, Cross-Complainant ERIC PARK was solicited by Cross-Defendant DAVID MAX, whereby Cross-Defendant DAVID MAX proposed that he would act as a promoter of Defendant AUTOPEdia, INC., obtain and raise shareholders, monies, funding, business deals, and strategic transactions for the benefit of Cross-Complainant ERIC PARK and Defendant AUTOPEdia, INC.”
10. Please state all trade secrets, intellectual property, proprietary and confidential information which had evolved from the efforts and work of

Cross-Complainant ERIC PARK that you contend Cross-Complainant ERIC PARK and Defendant AUTOPEDIA, INC., disclosed to Cross-Defendant DAVID MAX as alleged in paragraph 10 of your cross complaint.

11. Please identify all WRITINGS that you contend support your contention that trade secrets, intellectual property, proprietary and confidential information which had evolved from the efforts and work of Cross-Complainant ERIC PARK were disclosed by Cross-Complainant ERIC PARK and Defendant AUTOPEDIA, INC., to Cross-Defendant DAVID MAX as alleged in paragraph 10 of your cross complaint.
12. Please identify all witnesses that have knowledge of any fact supporting your contention that trade secrets, intellectual property, proprietary and confidential information which had evolved from the efforts and work of Cross-Complainant ERIC PARK were disclosed by Cross-Complainant ERIC PARK and Defendant AUTOPEDIA, INC., to Cross-Defendant DAVID MAX as alleged in paragraph 10 of your cross complaint.
13. Please state all facts that support your contention that: “Cross-Defendant DAVID MAX promised and represented to Cross-Complainant ERIC PARK that he would at all times guard such proprietary information in the strictest confidence, both as to information already conveyed and information that would be conveyed in the future,” as alleged in paragraph 10 of your cross-complaint.
14. Please identify all WRITINGS that support your contention that: “Cross-Defendant DAVID MAX promised and represented to Cross-Complainant ERIC PARK that he would at all times guard such proprietary information in the strictest confidence, both as to information already conveyed and information that would be conveyed in the future,” as alleged in paragraph 10 of your cross-complaint.
15. Please identify all witnesses that have knowledge of any fact supporting your contention that: “Cross-Defendant DAVID MAX promised and represented to Cross-Complainant ERIC PARK that he would at all times guard such proprietary information in the strictest confidence, both as to information already conveyed and information that would be conveyed in the future” as alleged in paragraph 10 of your cross-complaint.

16. Please state all facts that support your contention in paragraph 10 of your cross complaint that: "In return for his promise to maintain such confidential relationship and act as a promoter, Cross-Defendant DAVID MAX became a shareholder, promoter, director and officer of Defendant AUTOPEDIA, INC."
17. Please identify all WRITINGS supporting your contention in paragraph 10 of your cross-complaint that: "In return for his promise to maintain such confidential relationship and act as a promoter, Cross-Defendant DAVID MAX became a shareholder, promoter, director and officer of Defendant AUTOPEDIA, INC."
18. Please identify all witnesses with knowledge of any fact supporting your contention in paragraph 10 of your cross-complaint that: "In return for his promise to maintain such confidential relationship and act as a promoter, Cross-Defendant DAVID MAX became a shareholder, promoter, director and officer of Defendant AUTOPEDIA, INC."
19. Please state all facts supporting your contention as alleged in paragraph 12 of your cross-complaint that: " in or about 1998, and in or about 1999, Cross-Defendant DAVID MAX in his capacity as a shareholder, promoter, director and officer of Defendant AUTOPEDIA, INC., became aware of the confidential and proprietary plans by Cross-Complainant ERIC PARK and Defendant AUTOPEDIA, INC., to expand the collaborative consumer network on the Internet using scientific principles related to "scale free networks," and a legal infrastructure involving trademarks and patents."
20. Please identify all WRITINGS supporting your contention as alleged in paragraph 12 of your cross-complaint that: " in or about 1998, and in or about 1999, Cross-Defendant DAVID MAX in his capacity as a shareholder, promoter, director and officer of Defendant AUTOPEDIA, INC., became aware of the confidential and proprietary plans by Cross-Complainant ERIC PARK and Defendant AUTOPEDIA, INC., to expand the collaborative consumer network on the Internet using scientific principles related to "scale free networks," and a legal infrastructure involving trademarks and patents."
21. Please identify all witnesses with knowledge of any fact supporting your contention that: " in or about 1998, and in or about 1999, Cross-Defendant

DAVID MAX in his capacity as a shareholder, promoter, director and officer of Defendant AUTOPEdia, INC., became aware of the confidential and proprietary plans by Cross-Complainant ERIC PARK and Defendant AUTOPEdia, INC., to expand the collaborative consumer network on the Internet using scientific principles related to "scale free networks," and a legal infrastructure involving trademarks and patents."

22. Please state the date of each confidential corporate meetings, including meetings with company attorneys where attorney-client information was exchanged under privilege in which you contend Cross-Defendant DAVID MAX acquired knowledge of confidential and proprietary plans by Cross-Complainant ERIC PARK and Defendant AUTOPEdia, INC., to expand the collaborative consumer network on the Internet using scientific principles related to "scale free networks," and a legal infrastructure involving trademarks and patents.
23. Please identify all WRITINGS that support your contention that there were confidential corporate meetings, including meetings with company attorneys where attorney-client information was exchanged under privilege in which Cross-Defendant DAVID MAX acquired knowledge confidential and proprietary plans by Cross-Complainant ERIC PARK and Defendant AUTOPEdia, INC., to expand the collaborative consumer network on the Internet using scientific principles related to "scale free networks", and a legal infrastructure involving trademarks and patents.
24. Please identify all witnesses with knowledge of any fact supporting your contention that there were confidential corporate meetings, including meetings with company attorneys where attorney-client information was exchanged under privilege in which Cross-Defendant DAVID MAX acquired knowledge confidential and proprietary plans by Cross-Complainant ERIC PARK and Defendant AUTOPEdia, INC., to expand the collaborative consumer network on the Internet using scientific principles related to "scale free networks," and a legal infrastructure involving trademarks and patents.
25. Please state how: "Cross-Complainant ERIC PARK and Cross-Defendant DAVID MAX worked closely together on the confidential expansion plans for the "scale free network" which would later become known as the "Pedia Network", including implementation of a legal structure for ownership and

operation of the network.”

26. Please identify all WRITINGS that support your contention that: “Cross-Complainant ERIC PARK and Cross-Defendant DAVID MAX worked closely together on the confidential expansion plans for the "scale free network" which would later become known as the "Pedia Network", including implementation of a legal structure for ownership and operation of the network.”
27. Please identify all witnesses with knowledge of any fact supporting your contention that: “Cross-Complainant ERIC PARK and Cross-Defendant DAVID MAX worked closely together on the confidential expansion plans for the "scale free network" which would later become known as the "Pedia Network", including implementation of a legal structure for ownership and operation of the network.”
28. Please identify each domain name that defendant ERIC PARK acquired and agreed would all be owned and operated by the "Pedia Network".
29. Please identify all WRITINGS that support your contention that defendant ERIC PARK acquired additional domain names that he agreed would be owned and operated by the "Pedia Network".
30. Please identify all witnesses with knowledge of any fact supporting your contention that defendant ERIC PARK acquired additional domain names that he agreed would be owned and operated by the "Pedia Network".
31. Please identify each domain name that David Max acquired and agreed would all be owned and operated by the "Pedia Network".
32. Please identify all WRITINGS that support your contention that David Max acquired additional domain names that he agreed would be owned and operated by the "Pedia Network".
33. Please identify all witnesses with knowledge of any fact supporting your contention that defendant David Max acquired additional domain names that he agreed would be owned and operated by the "Pedia Network".
34. Please state all facts that support your contention that: “in 1999,

implementation of the "Pedia Network" legal structure began with the incorporation of Cross-Complainants SPORTSPEDIA, INC., and INFORMATION SUPERBRAND, INC., and later in the year 2000, TRAVELPEDIA, INC.”

35. Please identify all WRITINGS that support your contention that: “in 1999, implementation of the "Pedia Network" legal structure began with the incorporation of Cross-Complainants SPORTSPEDIA, INC., and INFORMATION SUPERBRAND, INC., and later in the year 2000, TRAVELPEDIA, INC.”
36. Please identify all witnesses with knowledge of any fact supporting your contention that: “in 1999, implementation of the "Pedia Network" legal structure began with the incorporation of Cross-Complainants SPORTSPEDIA, INC., and INFORMATION SUPERBRAND, INC., and later in the year 2000, TRAVELPEDIA, INC.”
37. Please list each asset, monies and income of INFORMATION SUPERBRAND, INC., that David Max used to expand the website, business and content hosted at the domain name www.huskerpedia.com from 1999 through February 25, 2010.
38. Please identify all WRITINGS that support your contention that David Max used assets, monies and income of INFORMATION SUPERBRAND, INC., to expand the website, business and content hosted at the domain name www.huskerpedia.com from 1999 through February 25, 2010.
39. Please identify all witnesses with knowledge of any fact supporting your contention that David Max used assets, monies and income of INFORMATION SUPERBRAND, INC., to expand the website, business and content hosted at the domain name www.huskerpedia.com from 1999 through February 25, 2010.
40. Please list each asset, monies and income of SPORTSPEDIA, INC., that David Max used to expand the website, business and content hosted at the domain name www.huskerpedia.com from 1999 through February 25, 2010.
41. Please identify all WRITINGS that support your contention that David Max used assets, monies and income of SPORTSPEDIA, INC., to expand the

website, business and content hosted at the domain name www.huskerpedia.com from 1999 through February 25, 2010.

42. Please identify all witnesses with knowledge of any fact supporting your contention that David Max used assets, monies and income of SPORTSPEDIA, INC., to expand the website, business and content hosted at the domain name www.huskerpedia.com from 1999 through February 25, 2010.
43. Please list each asset, monies and income of TRAVELPEDIA, INC., that David Max used to expand the website, business and content hosted at the domain name www.huskerpedia.com from 1999 through February 25, 2010.
44. Please identify all WRITINGS that support your contention that David Max used assets, monies and income of TRAVELPEDIA, INC., to expand the website, business and content hosted at the domain name www.huskerpedia.com from 1999 through February 25, 2010.
45. Please identify all witnesses with knowledge of any fact supporting your contention that David Max used assets, monies and income of TRAVELPEDIA, INC., to expand the website, business and content hosted at the domain name www.huskerpedia.com from 1999 through February 25, 2010.
46. Please state all facts that support your contention that in or about 2003, DAVID MAX transferred the ownership of the website, business and domain name www.huskerpedia.com from the subsidiary SPORTSPEDIA, INC., to the parent company Cross-Complainant INFORMATION SUPERBRAND, INC.
47. Please identify all WRITINGS supporting your contention that in or about 2003, DAVID MAX transferred the ownership of the website, business and domain name www.huskerpedia.com from the subsidiary SPORTSPEDIA, INC., to the parent company Cross-Complainant INFORMATION SUPERBRAND, INC.
48. Please identify all witnesses with knowledge of any fact supporting your contention that in or about 2003, DAVID MAX transferred the ownership of the website, business and domain name www.huskerpedia.com from the

subsidiary SPORTSPEDIA, INC., to the parent company Cross-Complainant INFORMATION SUPERBRAND, INC.

49. Please state all facts that support your contention that INFORMATION SUPERBRAND, INC. has continuously been the owner, without interruption of the website and business known as www.huskerpedia.com since at least December 2003 through the present.
50. Please identify all WRITINGS that support your contention that INFORMATION SUPERBRAND, INC. has continuously been the owner, without interruption of the website and business known as www.huskerpedia.com since at least December 2003 through the present.
51. Please identify all witnesses with knowledge of any fact that supports your contention that INFORMATION SUPERBRAND, INC. has continuously been the owner, without interruption of the website and business known as www.huskerpedia.com since at least December 2003 through the present.
52. Please state all facts that support your contention: “In or about 2008, Cross-Defendant DAVID MAX had failed as a promoter to obtain any strategic deal for the company INFORMATION SUPERBRAND, INC., and began to revitalize his idea to separately fund Cross-Complainant SPORTSPEDIA, INC.”
53. Please identify all WRITINGS supporting your contention: “In or about 2008, Cross-Defendant DAVID MAX had failed as a promoter to obtain any strategic deal for the company INFORMATION SUPERBRAND, INC., and began to revitalize his idea to separately fund Cross-Complainant SPORTSPEDIA, INC.”
54. Please identify all witnesses with knowledge of any fact that supports your contention: “In or about 2008, Cross-Defendant DAVID MAX had failed as a promoter to obtain any strategic deal for the company INFORMATION SUPERBRAND, INC., and began to revitalize his idea to separately fund Cross-Complainant SPORTSPEDIA, INC.”
55. Please state all facts that support your contention: “Before any funding of Cross-Complainant SPORTSPEDIA, INC. was arranged, Cross-Defendant DAVID MAX desired to renegotiate his position with Cross-Complainant

INFORMATION SUPERBRAND, INC., as to the www.huskerpedia.com website.”

56. Please identify all WRITINGS supporting your contention: “Before any funding of Cross-Complainant SPORTSPEDIA, INC. was arranged, Cross-Defendant DAVID MAX desired to renegotiate his position with Cross-Complainant INFORMATION SUPERBRAND, INC., as to the www.huskerpedia.com website.”
57. Please identify all witnesses with knowledge of any fact supporting your contention: “Before any funding of Cross-Complainant SPORTSPEDIA, INC. was arranged, Cross-Defendant DAVID MAX desired to renegotiate his position with Cross-Complainant INFORMATION SUPERBRAND, INC., as to the www.huskerpedia.com website.”
58. Please state all facts supporting your contention: “The expressed concerns of Cross-Defendant DAVID MAX were that such funding event might require a restructure of his separate ownership share in Cross-Complainant SPORTSPEDIA, INC., his desire to preserve the value of that added separate personal interest, his actual conflict of interest in the potential deal, and his knowledge that the domain name www.huskerpedia.com had originally been intended to be retained in Cross-Complainant SPORTSPEDIA, INC., in March 2000, but was subsequently transferred by him to Cross-Complainant INFORMATION SUPERBRAND, INC., in or about 2003 or 2004.
59. Please identify all WRITINGS supporting your contention: “The expressed concerns of Cross-Defendant DAVID MAX were that such funding event might require a restructure of his separate ownership share in Cross-Complainant SPORTSPEDIA, INC., his desire to preserve the value of that added separate personal interest, his actual conflict of interest in the potential deal, and his knowledge that the domain name www.huskerpedia.com had originally been intended to be retained in Cross-Complainant SPORTSPEDIA, INC., in March 2000, but was subsequently transferred by him to Cross-Complainant INFORMATION SUPERBRAND, INC., in or about 2003 or 2004.
60. Please identify all witnesses with knowledge of any fact supporting your contention: “The expressed concerns of Cross-Defendant DAVID MAX

were that such funding event might require a restructure of his separate ownership share in Cross-Complainant SPORTSPEDIA, INC., his desire to preserve the value of that added separate personal interest, his actual conflict of interest in the potential deal, and his knowledge that the domain name www.huskerpedia.com had originally been intended to be retained in Cross-Complainant SPORTSPEDIA, INC., in March 2000, but was subsequently transferred by him to Cross-Complainant INFORMATION SUPERBRAND, INC., in or about 2003 or 2004.

61. Please state the name, address and telephone number of each person who drafted the “Trademark License and Website Business Agreement” attached as exhibit “A” to your cross-complaint.
62. Please identify all witnesses with knowledge of the drafting of the “Trademark License and Website Business Agreement” attached as exhibit “A” to your cross-complaint.
63. Please state all facts that support your contention that David Max: “improperly used company monies, funds, and accounts for his own benefit.”
64. Please identify all WRITINGS supporting your contention that David Max: “improperly used company monies, funds, and accounts for his own benefit.”
65. Please identify all witnesses with knowledge of any fact that supports your contention that David Max: “improperly used company monies, funds, and accounts for his own benefit.”
66. Please state all facts that support your contention that David Max: “made cash payments to friends and family members from cash taken in by the company at its events.”
67. Please identify all WRITINGS supporting your contention that David Max: “made cash payments to friends and family members from cash taken in by the company at its events.”
68. Please identify all witnesses with knowledge of any fact that supports your contention that David Max: “made cash payments to friends and family

members from cash taken in by the company at its events. ”

69. Please state all facts that support your contention David Max: “paid or received kickbacks from company funds.”
70. Please identify all WRITINGS supporting your contention that David Max: “paid or received kickbacks from company funds.”
71. Please identify all witnesses with knowledge of any fact that supports your contention that David Max: “paid or received kickbacks from company funds.”
72. Please state all facts that support your contention David Max: “commingled his own funds with company funds.”
73. Please identify all WRITINGS supporting your contention that David Max: “commingled his own funds with company funds. ”
74. Please identify all witnesses with knowledge of any fact that supports your contention that David Max: “commingled his own funds with company funds .”
75. Please state all facts that support your contention David Max: “had company credit cards, phones and memberships issued to friends and family members.”
76. Please identify all WRITINGS supporting your contention that David Max: “had company credit cards, phones and memberships issued to friends and family members ”
77. Please identify all witnesses with knowledge of any fact that supports your contention that David Max: “had company credit cards, phones and memberships issued to friends and family members.”
78. Please state all facts that support your contention David Max: “bought goods or merchandise for himself, friends or family with company funds.”
79. Please identify all WRITINGS supporting your contention that David Max: “ bought goods or merchandise for himself, friends or family with company

funds.”

80. Please identify all witnesses with knowledge of any fact that supports your contention that David Max: “bought goods or merchandise for himself, friends or family with company funds.”
81. Please state all facts that support your contention David Max: “misrepresented his activities with company accounts in order to conceal them from other officers and shareholders.”
82. Please identify all WRITINGS supporting your contention that David Max: “misrepresented his activities with company accounts in order to conceal them from other officers and shareholders.”
83. Please identify all witnesses with knowledge of any fact that supports your contention that David Max: “misrepresented his activities with company accounts in order to conceal them from other officers and shareholders.”
84. Please state all facts that support your contention David Max: “submitted false expenses for reimbursement with company funds.”
85. Please identify all WRITINGS supporting your contention that David Max: “submitted false expenses for reimbursement with company funds.”
86. Please identify all witnesses with knowledge of any fact that supports your contention that David Max: “submitted false expenses for reimbursement with company funds.”
87. Please state all facts that support your contention David Max: “engaged in self-dealing transactions. ”
88. Please identify all WRITINGS supporting your contention that David Max: “engaged in self-dealing transactions.”
89. Please identify all witnesses with knowledge of any fact that supports your contention that David Max: “engaged in self-dealing transactions.”
90. Please state all facts that support your contention David Max: “paid for entertainment and travel expenses for himself and family members that were

unrelated to company business. ”

91. Please identify all WRITINGS supporting your contention that David Max: “paid for entertainment and travel expenses for himself and family members that were unrelated to company business. ”
92. Please identify all witnesses with knowledge of any fact that supports your contention that David Max: “paid for entertainment and travel expenses for himself and family members that were unrelated to company business.”
93. Please state all facts that support your contention David Max: “failed to accurately report the extent of purported company debt in order to cover up his own wrong-doing.”
94. Please identify all WRITINGS supporting your contention that David Max: “failed to accurately report the extent of purported company debt in order to cover up his own wrong-doing. ”
95. Please identify all witnesses with knowledge of any fact that supports your contention that David Max: “failed to accurately report the extent of purported company debt in order to cover up his own wrong-doing.”
96. Please state all facts that support your contention David Max: “engaged in unauthorized transactions.”
97. Please identify all WRITINGS supporting your contention that David Max: “engaged in unauthorized transactions.”
98. Please identify all witnesses with knowledge of any fact that supports your contention that David Max: “engaged in unauthorized transactions.”
99. Please state all facts that support your contention David Max: “delayed financial accounting in order to deter investigation.”
100. Please identify all WRITINGS supporting your contention that David Max: “delayed financial accounting in order to deter investigation.”
101. Please identify all witnesses with knowledge of any fact that supports your contention that David Max: “delayed financial accounting in order to deter

investigation.”

102. Please state all facts that support your contention David Max: “engaged in other self-dealing, conflicts of interest, and wrongful acts.”
103. Please identify all WRITINGS supporting your contention that David Max: “engaged in other self-dealing, conflicts of interest, and wrongful acts.”
104. Please identify all witnesses with knowledge of any fact that supports your contention that David Max: “engaged in other self-dealing, conflicts of interest, and wrongful acts.”
105. Please list all content, customers, goodwill, confidential trade secrets, customer and supplier lists you contend David Max stole from you.
106. Please identify all WRITINGS supporting your contention that David Max stole content, customers, goodwill, confidential trade secrets, customer and supplier lists from you.
107. Please identify all witnesses with knowledge of any fact supporting your contention that David Max stole content, customers, goodwill, confidential trade secrets, customer and supplier lists from you.
108. Please list all content, customers, goodwill, confidential trade secrets, customer and supplier lists you contend were copyrighted by you and which you contend David Max infringed upon.
109. Please identify all WRITINGS supporting your contention that David Max infringed upon certain content, customers, goodwill, confidential trade secrets, customer and supplier lists that you had copyrighted.
110. Please identify all witnesses with knowledge of any fact supporting your contention that David Max infringed upon certain content, customers, goodwill, confidential trade secrets, customer and supplier lists that you had copyrighted.
111. Please state all facts that support your contention in paragraph 67 of your cross-complaint that David Max obtained unjust and wrongful profits to which he was not entitled.

112. Please identify all WRITINGS supporting your contention in paragraph 67 of your cross-complaint that David Max obtained unjust and wrongful profits to which he was not entitled.
113. Please identify all witnesses with knowledge of any fact supporting your contention in paragraph 67 of your cross-complaint that David Max obtained unjust and wrongful profits to which he was not entitled.
114. Please state all facts supporting your contention in paragraph 68 of your cross-complaint that you have been deprived of the benefits of trade secrets, suffered a diminution of value to their business traceable to the wrongful acts of David Max and suffered other losses.
115. Please identify all WRITINGS supporting your contention in paragraph 68 of your cross-complaint that you have been deprived of the benefits of trade secrets, suffered a diminution of value to their business traceable to the wrongful acts of David Max and suffered other losses.
116. Please identify all witnesses with knowledge of any fact supporting your contention in paragraph 68 of your cross-complaint that you have been deprived of the benefits of trade secrets, suffered a diminution of value to their business traceable to the wrongful acts of David Max and suffered other losses.
117. Please state all facts supporting your contention in paragraph 83 of your cross-complainant that DAVID MAX did wrongfully make or receive checks and withdrawals for a specific purpose not authorized, did wrongfully endorse and cash these checks, or wrongfully make withdrawals, and did wrongfully and unlawfully convert the proceeds thereof to his own use and benefit.
118. Please identify all WRITINGS supporting your contention in paragraph 83 of your cross-complainant that DAVID MAX did wrongfully make or receive checks and withdrawals for a specific purpose not authorized, did wrongfully endorse and cash these checks, or wrongfully make withdrawals, and did wrongfully and unlawfully convert the proceeds thereof to his own use and benefit.
119. Please identify all witnesses with knowledge of any fact supporting your

contention in paragraph 83 of your cross-complainant that DAVID MAX did wrongfully make or receive checks and withdrawals for a specific purpose not authorized, did wrongfully endorse and cash these checks, or wrongfully make withdrawals, and did wrongfully and unlawfully convert the proceeds thereof to his own use and benefit.

120. Please identify each false, slanderous and libelous statement you contend David Max published so as to disparage your goods, services, and business.
121. For each false, slanderous and libelous statement you contend David Max published so as to disparage your goods, services, and business, identify all WRITINGS that support you contention.
122. Please identify all witnesses with knowledge of any fact supporting you contention that David Max published false, slanderous and libelous statements so as to disparage your goods, services, and business.
123. Please state all facts supporting your contention that: “At all times herein mentioned, the acts of Cross-Defendants DAVID MAX and ROES 1 through 750, inclusive, were intended as acts of trade libel with malice by Cross-Defendants toward Cross-Complainants which resulted in Cross-Defendants obtaining unjust and wrongful profits of their own, to which they otherwise were not entitled.”
124. Please identify all WRITINGS supporting your contention that: “At all times herein mentioned, the acts of Cross-Defendants DAVID MAX and ROES 1 through 750, inclusive, were intended as acts of trade libel with malice by Cross-Defendants toward Cross-Complainants which resulted in Cross-Defendants obtaining unjust and wrongful profits of their own, to which they otherwise were not entitled.”
125. Please identify all witnesses with knowledge of any fact supporting your contention that: “At all times herein mentioned, the acts of Cross-Defendants DAVID MAX and ROES 1 through 750, inclusive, were intended as acts of trade libel with malice by Cross-Defendants toward Cross-Complainants which resulted in Cross-Defendants obtaining unjust and wrongful profits of their own, to which they otherwise were not entitled.”

126. Please state all facts that support your contention that: “Within the past ninety days Cross-Defendants DAVID MAX, and ROES 1 through 750, inclusive, have sent cease and desist letter(s) under the Digital Millennium Copyright Act to the hosting services for Cross-Complainants with knowledge that claims of copyright infringement were false.”
127. Please identify all WRITINGS that support your contention: “Within the past ninety days Cross-Defendants DAVID MAX, and ROES 1 through 750, inclusive, have sent cease and desist letter(s) under the Digital Millennium Copyright Act to the hosting services for Cross-Complainants with knowledge that claims of copyright infringement were false.”
128. Please identify all witnesses with knowledge of any fact that supports your contention: “Within the past ninety days Cross-Defendants DAVID MAX, and ROES 1 through 750, inclusive, have sent cease and desist letter(s) under the Digital Millennium Copyright Act to the hosting services for Cross-Complainants with knowledge that claims of copyright infringement were false.”
129. Please state all facts that support your contention that: “As a result, Cross-Complainants have been injured and incurred attorney fees in an amount according to proof at the time of trial.”
130. Please identify all WRITINGS that support your contention: “As a result, Cross-Complainants have been injured and incurred attorney fees in an amount according to proof at the time of trial.”
131. Please identify all witnesses with knowledge of any fact that supports your contention that: “As a result, Cross-Complainants have been injured and incurred attorney fees in an amount according to proof at the time of trial.”
132. Please state all facts that support your contention that: “DAVID MAX has made claims, and continues to make such claims, to control over the corporate property and assets of Cross-Complainants without any legal right to do so.”
133. Please identify all WRITINGS that support your contention that: “DAVID MAX has made claims, and continues to make such claims, to control over the corporate property and assets of Cross-Complainants without any legal

right to do so.”

134. Please identify all witnesses with knowledge of any fact supporting your contention that: “DAVID MAX has made claims, and continues to make such claims, to control over the corporate property and assets of Cross-Complainants without any legal right to do so.”
135. Please state all facts supporting your contention that: “DAVID MAX, and ROES 1 through 750, inclusive, are in possession of the Cross-Complainants corporation books, assets, and accounts, and other property and have failed and refused to return such property.”
136. Please identify all WRITINGS supporting your contention that: “DAVID MAX, and ROES 1 through 750, inclusive, are in possession of the Cross-Complainants corporation books, assets, and accounts, and other property and have failed and refused to return such property.”
137. Please identify all witnesses with knowledge of any fact supporting your contention that: “DAVID MAX, and ROES 1 through 750, inclusive, are in possession of the Cross-Complainants corporation books, assets, and accounts, and other property and have failed and refused to return such property.”
138. Please state all facts that support your contention that: “In October 2008, the parties reached an agreement concerning the services of Cross-Defendant DAVID MAX as website architect for www.huskerpedia.com.”
139. Please identify all WRITINGS that support your contention that: “In October 2008, the parties reached an agreement concerning the services of Cross-Defendant DAVID MAX as website architect for www.huskerpedia.com.”
140. Please identify all witnesses with knowledge of any fact supporting your contention that: “In October 2008, the parties reached an agreement concerning the services of Cross-Defendant DAVID MAX as website architect for www.huskerpedia.com.”
141. Please state all facts that support your contention that: “In September 2009, Cross-Defendant DAVID MAX renegotiated his position with

Cross-Complainant INFORMATION SUPERBRAND, INC., as to the www.huskerpedia.com website. This time, Cross-Defendant DAVID MAX obtained more shares in Cross-Complainant INFORMATION SUPERBRAND, INC.”

142. Please identify all WRITINGS that support your contention that: “In September 2009, Cross-Defendant DAVID MAX renegotiated his position with Cross-Complainant INFORMATION SUPERBRAND, INC., as to the www.huskerpedia.com website. This time, Cross-Defendant DAVID MAX obtained more shares in Cross-Complainant INFORMATION SUPERBRAND, INC.”
143. Please identify all witnesses with knowledge of any fact that supports your contention that: “In September 2009, Cross-Defendant DAVID MAX renegotiated his position with Cross-Complainant INFORMATION SUPERBRAND, INC., as to the www.huskerpedia.com website. This time, Cross-Defendant DAVID MAX obtained more shares in Cross-Complainant INFORMATION SUPERBRAND, INC.”
144. Please state all facts that support your contention: “Cross-Complainants have performed all duties, promises, and obligations required and all conditions precedent that were agreed to be performed in the agreement described in paragraphs 29 and 30.”
145. Please identify all WRITINGS that support your contention: “Cross-Complainants have performed all duties, promises, and obligations required and all conditions precedent that were agreed to be performed in the agreement described in paragraphs 29 and 30.”
146. Please identify all witnesses with knowledge of any fact that supports your contention: “Cross-Complainants have performed all duties, promises, and obligations required and all conditions precedent that were agreed to be performed in the agreement described in paragraphs 29 and 30.”
147. Do you contend that you were excused from performing any of the obligations that you were to perform under the agreements described in paragraphs 29 and 30 of your cross-complaint?
148. If you contend that you were excused from performing any of the

obligations that you were to perform under the agreements described in paragraphs 29 and 30 of your cross-complaint, please describe the obligations that you were excused from performing.


149. If you contend that you were excused from performing any of the obligations that you were to perform under the agreements described in paragraphs 29 and 30 of your cross-complaint, please identify all WRITINGS that support your contention.
150. If you contend that you were excused from performing any of the obligations that you were to perform under the agreements described in paragraphs 29 and 30 of your cross-complaint, please identify all witnesses with knowledge of any fact that supports your contention.
151. Please state all facts that support your contention: “that while acting as a director and officer, Cross-Defendant DAVID MAX engaged in self-dealing transactions in violation of the California Corporations Code relating to self-dealing by company directors and officers, including but not limited to section 310.”
152. Please identify all WRITING that supporting your contention: “that while acting as a director and officer, Cross-Defendant DAVID MAX engaged in self-dealing transactions in violation of the California Corporations Code relating to self-dealing by company directors and officers, including but not limited to section 310.”
153. Please identify all witnesses with knowledge of any fact supporting your contention: “that while acting as a director and officer, Cross-Defendant DAVID MAX engaged in self-dealing transactions in violation of the California Corporations Code relating to self-dealing by company directors and officers, including but not limited to section 310.”
154. Please list all current domain names owned by defendant Information Superbrand, Inc.
155. Please list all trademarks currently owned by defendant Information Superbrand, Inc.
156. Please list all creditors of defendant Information Superbrand, Inc. as of June

1, 2010.

157. For each creditor of defendant Information Superbrand, Inc. as of June 1, 2010, please state the amount owed to that creditor.
158. Please list all current domain names owned by defendant SportsPedia, Inc.
159. Please list all trademarks currently owned by defendant SportsPedia, Inc.
160. Please list all creditors of defendant SportsPedia, Inc. as of June 1, 2010.
161. For each creditor of defendant SportsPedia, Inc. as of June 1, 2010, please state the amount owed to that creditor.
162. Please list all current domain names owned by defendant AutoPedia, Inc.
163. Please list all trademarks currently owned by defendant AutoPedia, Inc.
164. Please list all creditors of defendant AutoPedia, Inc. as of June 1, 2010.
165. For each creditor of defendant AutoPedia, Inc. as of June 1, 2010, please state the amount owed to that creditor.
166. Please list all current domain names owned by defendant TravelPedia, Inc.
167. Please list all trademarks currently owned by defendant TravelPedia, Inc.
168. Please list all creditors of defendant TravelPedia, Inc. as of June 1, 2010.
169. For each creditor of defendant TravelPedia, Inc. as of June 1, 2010, please state the amount owed to that creditor.

DATED: May 24, 2010

REHM & ROGARI



Ralph Rogari, Attorneys for
plaintiff David Max

