

ATTORNEY OR PARTY WITHOUT ATTORNEY (NAME, STATE BAR NUMBER, AND ADDRESS) Greenberg Traurig LLP Danielle N Garno Esq (650)328-8500 1900 University Ave 5th Fl Palo Alto, CA 94303 <small>ATTORNEY FOR (name) Plaintiff</small>	Castle Copy # 211078 - 01
SUPERIOR COURT OF CALIFORNIA: SANTA CLARA COUNTY SUPERIOR COURT MAILING ADDRESS: 191 NORTH FIRST STREET CITY AND ZIP CODE: SAN JOSE, CA 95113 BRANCH NAME: Castle Copy Service	
PLAINTIFF / PETITIONER: Turks Ltd/Star Platinum Island/Ltd Dr Cem Kinay DEFENDANT / RESPONDENT: John Doe 1 and Does 2-50	
DEPOSITION SUBPOENA For Production of Business Records	Case Number: 1-09-CV-150301

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
 Google Inc, Custodian of Records, 1600 Amphitheatre Pkwy, Mountain View, CA 94043

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

To: Castle Copy Service On: September 10, 2009 or within 15 days of service At 10:00 A.M. Location: 2510 Douglas Blvd, Ste 500, Roseville, CA 95661 (or) Mail to: P.O. Box 790 Roseville, CA 95661 Do not release the requested records to the deposition officer prior to the date and time stated above.
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- a. by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - b. by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - c. by making the original business records described in item three available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witnesses pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows:
 See Attachment 3, incorporated herein by reference. *
 D.O.B. _____, SS# 000-00-0000

Continued on Attachment 3.

4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: August 21, 2009
 Danielle N Garno Esq

/S/ Danielle N Garno Esq

(TYPE OR PRINT NAME)

(SIGNATURE OF PERSON ISSUING SUBPOENA)
 Attorney At Law

Form Adopted for Mandatory Use
 Judicial Council of California
 SUBP-010 [Rev. January 1, 2007]

(TITLE)

Code of Civil Procedure, §§ 2020.410-2020.440
 Civil Code § 15 (a)(e)
 Government Code § 68097.1
 www.courtinfo.ca.gov

**DEPOSITION SUBPOENA FOR PRODUCTION
 OF BUSINESS RECORDS**

ATTACHMENT 3

TO DEPOSITION SUBPOENA FOR PRODUCTION
OF BUSINESS RECORDS

DOCUMENTS REQUESTEDDEFINITIONS

- A. "Concerning" means relating to, referring to, pertaining to, reflecting, describing, evidencing or constituting.
- B. "Document" means any kind of writing, electronic file, recorded graphic or photographic matter, however produced or reproduced, of any kind or description, whether sent or received, including originals, nonidentical copies (whether different from the originals because of marginal notes, or other material inserted therein or attached thereto, or otherwise), drafts and both sides thereof.
- C. In order to bring within the scope of this Subpoena all conceivably relevant and responsive documents which might otherwise be construed to be outside their scope:
- (1) the singular of each word shall be construed to include its plural and vice versa;
 - (2) the words "and" as well as "or" shall be construed alternatively, conjunctively as well as disjunctively;
 - (3) the word "including" shall mean "including without limitation.

INSTRUCTIONS

- A. This Subpoena is intended to cover all information and documents in your possession, custody or control.
- B. You shall produce any and all drafts and copies of each document that are responsive to any Document Request, and all copies of such documents that are not identical in any respect, including but not limited to copies containing handwritten notes, markings, stamps or interlineations.
- C. If any document requested herein was at one time in existence but has been lost, discarded, destroyed or is not now in your possession, custody and control, identify such documents as completely as possible and provide as much of the following information as possible:

- (1) the type of document;
- (2) its date;
- (3) the date or approximate date when it was lost, discarded or destroyed;
- (4) the circumstances and manner by which it was lost, discarded or destroyed;
- (5) the reason or reasons for disposing of the documents (if discarded or destroyed);
- (6) the identity of all persons authorizing or having knowledge of the circumstances surrounding the disposal of the document;
- (7) the identity of the person(s) who lost, discarded or destroyed the document; and
- (8) the identity of all persons having knowledge of the contents thereof.

DOCUMENTS REQUESTED

1. User identification information associated with the following Gmail accounts:
tcijournal@gmail.com
2. IP address log-in history for the following Gmail accounts:
tcijournal@gmail.com