IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

IN THE MATTER OF THE APPLICATION OF JUNE WU FOR AN ORDER TO TAKE DISCOVERY PURSUANT TO 28 U.S.C. § 1782

Misc. No. 17-mc- 221 (Gms)

[PROPOSED] ORDER

THIS CAUSE came before the Court upon the Ex Parte Application for Discovery Pursuant to 28 U.S.C. § 1782 (the "Application") filed by June Wu (the "Applicant"). The Court, having considered the Application, hereby ORDERS AND ADJUDGES as follows:

- 1. The Application is GRANTED.
- 2. The Applicant is authorized to issue and serve the subpoena attached to the Application as Exhibit 1 for the production of documents on Tagboard, Inc. ("Tagboard").
- 3. Tagboard shall produce the documents requested in the subpoena within thirty (30) days of service of the subpoena and as required under the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the District of Delaware.
- 4. The Applicant is authorized to issue and serve the subpoena attached to the Application as Exhibit 2 for the deposition of Josh Decker, who shall testify about matters relating to issues raised in the Application.
- 5. Josh Decker shall appear for a deposition in the District of Delaware on a mutually-agreeable date within 45 days of service of the documents requested in the subpoena, or at a time otherwise agreed to by the Applicant and Josh Decker.
- 6. The Applicant is authorized to issue and serve the subpoena attached to the Application as Exhibit 3 for the deposition of Tagboard, by a one or more designated

officers, directors, managing agents or other persons ("Designated Person") about the matters set out in the subpoena.

- 7. Tagboard's Designated Person shall appear for a deposition in the District of Delaware on a mutually-agreeable date within 45 days of service of the documents requested in the subpoena, or at a time otherwise agreed to by the Applicant and Tagboard.
- A custodian of records of Tagboard shall sign an affidavit in the form attached as Exhibit 4 to the Application.
- 9. The Applicant is authorized to issue additional subpoenas for the production of additional documents and to take the testimony of witnesses with respect to the matter referred to in the subpoena as the applicant may deem reasonably appropriate following its review of the documents produced in response to the subpoena.
- 10. David Zaslowsky, who has moved to be admitted to this Court pro hac vice, or any attorney admitted to the United States District for Delaware, be authorized to issue the subpoenas attached to this application to obtain such discovery pursuant to the Federal Rules of Civil Procedure.

SO ORDERED, this

SO ORDERED, this

UNITED STATES DISTRICY JUDG

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