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 15 **UNITED STATES DISTRICT COURT**
FOR THE NORTHERN DISTRICT OF CALIFORNIA
 16 **SAN JOSE DIVISION**

17 ECHOSTAR SATELLITE L.L.C. et al.,

18 Plaintiffs,

19 v.

20 FREETECH, INC. and DOES 1-10,

21 Defendants.

22
 23 FREETECH, INC.,

24 Counterclaimant,

25 v.

26 ECHOSTAR SATELLITE L.L.C. et al.,

27 Counter-defendants.
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Case No. CV-07-6124 JW (RS)

**[PROPOSED] ORDER GRANTING
 ECHOSTAR'S MOTION TO COMPEL
 COMPLETE INTERROGATORY
 RESPONSES AND PRODUCTION OF
 DOCUMENTS**

1 FOR GOOD CAUSE SHOWN, it is hereby ORDERED that Plaintiffs EchoStar Satellite
2 LLC (n/k/a DISH NETWORK LLC), EchoStar Technologies LLC, and NagraStar LLC's
3 Motion to Compel Complete Interrogatory Responses and Production of Documents ("Motion
4 to Compel") is hereby GRANTED.

5 Within 10 days of this Order, Defendant Freetech, Inc. is ORDERED to:

- 6 (1) Supplement its response to Interrogatory No. 1 to identify all internet nicknames
7 and/or monikers used by all present or former Freetech employees, dealers, and
8 independent contractors.
- 9 (2) Provide a complete response to Interrogatory No. 7, without reference to Rule
10 33(d), which includes the number of Coolsat receivers imported into the United
11 States by Freetech from January 1, 2003 to the present, specifying the quantity of
12 each model Coolsat receiver imported by Freetech and the date received by
13 Freetech.
- 14 (3) Provide a complete response to Interrogatory No. 8, without reference to Rule
15 33(d), which includes the number of Coolsat receivers distributed by Freetech
16 from January 1, 2003 to the present, specifying the quantity of each model
17 Coolsat receiver distributed by Freetech and the month and year distributed by
18 Freetech.
- 19 (4) Provide a complete response to Interrogatory No. 9, that identifies all
20 relationships and/or interactions between Freetech and any individual listed in
21 Interrogatory No. 9, including Reck Shim, David Smith, and Annette Lawson, as
22 well as all relationships and/or interactions between Freetech and any individual
23 that has been subject to allegations of involvement in satellite piracy of which
24 Freetech is aware. Freetech's response shall include the dates of the relationship
25 or interaction, the scope and purpose of the relationship or interaction, and the
26 amount of any money or a description of any non-monetary compensation or
27 services exchanged between Freetech and the individual(s).
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(5) Provide a complete response to Interrogatory No. 10, which identifies all relationships and/or interactions between Freetech and any person involved in the ownership or operation of any website listed in Interrogatory No. 10, including www.f2atv.com and www.Koreanf2a.tv.com, as well as all relationships and/or interactions between Freetech and any person involved in the ownership or operation of any website that has been subject to allegations of involvement in satellite piracy of which Freetech is aware. Freetech’s response shall include any past or present ownership interest in or control of the website by Freetech, Freetech’s past or present status as a moderator or administrator on the website, any advertisement by or on behalf of Freetech on the website, any posts made by or on behalf of Freetech on the website, the amount of any money or a description of any non-monetary compensation or services exchanges between the website and Freetech, and the last known contact information of each person that has an ownership interest in or operates the website.

(6) Produce all documents responsive to Requests for Production Nos. 54-57, 61, 62, 82-85, 88, 107 and 110.

Plaintiffs are awarded their reasonable attorneys’ fees and costs incurred in bringing their Motion to Compel, as well as reasonable attorneys’ fees and costs incurred in Plaintiffs’ efforts to obtain the discovery at issue. Plaintiffs shall prove their reasonable attorneys’ fees and costs by declaration.

IT IS SO ORDERED.

Dated: _____
Honorable Richard Seeborg
United States Magistrate Judge