IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ORACLE CORPORATION and ORACLE U.S.A. INC.,	)	
Plaintiffs/Counter-Defendants,	)	
v.	)	C.A. No. 06-414-SLR
EPICREALM LICENSING, LP,	)	
Defendant/Counter-Plaintiff.	)	

NOTICE OF RULE 30(b)(6) DEPOSITION
OF ORACLE CORPORATION (TOPIC NOS. 2-9)

PLEASE TAKE NOTICE that on September 17, 2007 at 9:00 a.m. at the Garden Court Hotel, 520 Cowper Street, Palo Alto, California 94301, or at such other time and place as agreed by the parties, defendant and counter-plaintiff epicRealm Licensing, LP, pursuant to Fed. R. Civ. P. 26 and 30, shall take the deposition upon oral examination of plaintiff and counter-defendant Oracle Corporation. The deposition will continue from day to day until completed and shall be taken before a duly certified court reporter and notary public or other person authorized by law to administer oaths. The deposition will be recorded by stenographic, sound and video means.

Pursuant to Fed. R. Civ. P. 30(b)(6), Oracle Corporation shall designate one or more officers, directors, managing agents or other representatives who consent to testify on its behalf, to testify to matters known or reasonably available to Oracle Corporation regarding the topics listed herein. To the extent more than one deponent is identified, Oracle Corporation shall state in advance of the deposition which portions of this notice each deponent is prepared to address.

Rule 30(b)(6) Deposition Topics

In accordance with Fed. R. Civ. P. 30(b)(6), epicRealm identifies the following matters for examination:

2. The identification of the source code for all versions of the following software:

   a. Oracle's "mod_OC4J"
   b. "Oracle Process Manager and Notification process"
   c. the "listener" or "TNS listener" associated with Oracle's XML DB or Oracle's Net Services
   d. the "dispatcher" associated with Oracle's XML DB
   e. Oracle's "CMGW (Connection Manager Gateway)
   f. Oracle's CMADMIN (Connection Manager Administration)
   g. all software that implements load balancing
   h. all Oracle Software that identifies requests for processing, determines which process should process a request, or routes or forwards a requests
   i. all Oracle Software compiled into the Oracle Web Server (OWS) that is not part of the Apache Web Server Version 1.3 Source Code and Version 2.0 Source Code.
   j. Oracle's Dynamic Monitoring Services (DMS)
   k. Oracle's "mod_plsql"
   l. Oracle's "mod_ose"

3. The location of the source code whose identity is requested in Topic No. 2 in the source code requested to be produced by Oracle in this litigation.

4. How to find the source code whose identity is requested in Topic No. 2 in the source code requested to be produced by Oracle in this litigation.

5. The identification of all tools and software used by Oracle, its agents, or any other party in developing, writing or reviewing the source code whose identity is requested in Topic No. 2.

6. The identification and commercial name of every Oracle product that incorporates or uses the source code whose identity is requested in Topic No. 2.

7. The identification of the authors of the source code whose identity is requested in Topic No. 2.

8. The identification of documentation or training materials defining Oracle's internal source code development standards and processes for the source code whose identity is requested in Topic No. 2.

9. The functionality and operation of the source code whose identity is requested in Topic No. 2.

For purposes of Topic Nos. 2-9, "Oracle" means Oracle Corporation and Oracle U.S.A. Inc., plaintiffs and counter-defendants in this action, and all predecessors, successors, subsidiaries, divisions, parents and/or affiliates thereof, past or present, and all past or present officers, directors, affiliates, agents, employees, attorneys, consultants, representatives and any other person acting or purporting to act on behalf of Oracle.

In order to facilitate the deposition, epicRealm requests that Oracle provide at the deposition a copy of all source code relevant to Topics Nos. 2-9 and a computer loaded with all source code relevant to Topics Nos. 2-9.

You are invited to attend and exercise your rights under the Federal Rules of Civil Procedure.

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Dated: August 31, 2007
816228 / 31393 / Oracle

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CERTIFICATE OF SERVICE

I, David E. Moore, hereby certify that on August 31, 2007, the attached document was electronically filed with the Clerk of the Court using CM/ECF which will send notification to the registered attorney(s) of record that the document has been filed and is available for viewing and downloading.

I further certify that on August 31, 2007, I have Electronically Mailed the document to the following person(s):

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