IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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

NOTICE OF RULE 30(B)(6) DEPOSITION OF EPICREALM LICENSING, LP

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs and Counterdefendants Oracle Corporation and Oracle U.S.A. Inc. ("Oracle"), by and through its attorneys, will take the deposition upon oral examination of Defendant and Counterclaimant epicRealm Licensing, LP ("epicRealm") beginning on January 29, 2007 at 9:30 a.m. at the Alpha Reporting Service, located at 7920 Beltline Road, Suite 500, Dallas, Texas 75254; Tel: (214) 321-5599, or at such other time and place as the parties may agree. 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. Pursuant to Fed. R. Civ. P. 30(b)(2), the testimony shall be recorded by stenographic, sound, and video means, including the use of interactive real time transcription (e.g., LiveNote).

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

You are invited to attend and cross examine.

DEFINITIONS

1. The "patents-in-suit" refer to U.S. Patent Nos. 5,894,554 and 6,415,335, together with any divisionals and counterparts thereof, the applications from which the patents issued, and all related U.S. and foreign applications.

2. The terms "documents" or "documents" is used in its customarily broad sense within the context of the Federal Rules of Civil Procedure and includes all documents as defined in Fed. R. Civ. P. 34, including any electronically stored information.

3. "EpicRealm," "you" and "your" mean epicRealm Licensing, LP, defendant and counterclaimant in this action, and all predecessors, successors, subsidiaries, divisions, parents and/or affiliates thereof, past or present, and all past or present officers, directors, partners, affiliates, agents, employees, attorneys, consultants, representatives and any other person acting or purporting to act on behalf of epicRealm.

4. "Oracle" means Oracle Corporation and Oracle U.S.A. Inc., plaintiffs and counterdefendants 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.

5. "Person" means any natural person, corporation, proprietorship, partnership, joint venture, association, firm or entity recognized in law, and shall include the owners, officers, directors, agents, trustees, parents, subsidiaries, affiliates, assigns, predecessors and successors of such person.

DEPOSITION TOPICS

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

1. The business, organization, corporate structure, management, and ownership of epicRealm and any predecessor or successor-in-interest to epicRealm, including but not limited to Parallel Networks, LLC.

2. The acquisition, assignment or transfer of any assets, including the patents-in-suit, by or from epicRealm and any predecessor or successor-in-interest to epicRealm, including but not limited to Parallel Networks, LLC.

3. Identification of any products or technology that embody the claimed invention(s) of the patents-in-suit, including the design, structure, operation and functionality of any such products or technology.

4. Marketing, advertising, sale and licensing of any products or technology that embody the claimed invention(s) of the patents-in-suit.

5. Licensing of the patent-in-suit, including any and all licenses, offers to license, monetary valuations, settlements, offers to settle, or any other oral or written negotiations or agreements concerning the patents-in-suit, and any royalties or other consideration derived therefrom.

6. Enforcement of the patents-in-suit, including identification of any alleged acts of infringement and any past, pending, or anticipated litigation involving the patents-in-suit.

7. The actual or required marking of any products that embody the claimed invention(s) of, and/or are licensed under, the patents-in-suit, including identification of all such products and any efforts made by you to enforce any such marking requirements.

8. Your first knowledge of Oracle's alleged infringement of the patents-in-suit.

9. The location, collection and production of documents by you in this action, including any document retention and/or destruction practices and policies of epicRealm and identification of all persons who have knowledge relevant to this topic.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

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January 8, 2008

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CERTIFICATE OF SERVICE

I hereby certify that on January 8, 2008, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF which will send electronic notification of such filing to the following:

Richard L. Horwitz
David Ellis Moore
POTTER ANDERSON & CORROON, LLP

Additionally, I hereby certify that true and correct copies of the foregoing were caused to be served on January 8, 2008 upon the following individuals in the manner indicated:

BY E-MAIL

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