



**IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE**

RODNEY JOFFE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	C.A. No. 2022-1041-KSJM
NEUSTAR, INC. and SECURITY	)	
SERVICES, LLC,	)	
	)	
Defendants.	)	

**SUBPOENA DUCES TECUM**

TO: Georgia Institute of Technology  
Office of Legal Affairs  
760 Spring Street N.W., Suite 324  
Atlanta, Georgia 30332-0495

This subpoena is issued pursuant to Court of Chancery Rule 45 and the Uniform Interstate Depositions and Discovery Act. Court of Chancery Rules 45(c) and (d), attached hereto, set forth the protections and duties with respect to this subpoena.

**YOU ARE HEREBY COMMANDED** to produce the documents identified in **Schedule A** hereto on or before May 10, 2023, at the offices of Young Conaway Stargatt & Taylor, LLP, 1000 North King Street, Wilmington, Delaware 19801.

A copy of the Stipulation and Order for the Production and Exchange of Confidential Information is attached as **Schedule B**.

YOUNG CONAWAY STARGATT &  
TAYLOR, LLP

OF COUNSEL:

John M. McNichols (*pro hac vice*)  
Stephen L. Wohlgemuth (*pro hac vice* forthcoming)  
Allison S. Eisen (*pro hac vice*)  
Kathryn E. Garza (*pro hac vice*)  
Peter S. Jorgensen (*pro hac vice*)  
WILLIAMS & CONNOLLY LLP  
680 Maine Avenue, S.W.  
Washington, D.C. 20024  
(202) 434-5000

/s/ William E. Gamgort  
Timothy Jay Houseal (No. 2880)  
William E. Gamgort (No. 5011)  
Rodney Square  
1000 North King Street  
Wilmington, DE 19801  
Telephone: (302) 571-6600

*Counsel for Security Services, LLC*

Dated: April 26, 2023

## **RULE 45. SUBPOENA**

### **(c) Protection of persons subject to subpoenas.**

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and may impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated documents, electronically stored information, or tangible things or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court on behalf of which the subpoena was issued shall quash or modify the subpoena if it:

(i) Fails to allow reasonable time for compliance;

(ii) Requires disclosure of privileged or other protected matter and no exception or waiver applies; or

(iii) Subjects a person to undue burden.

(B) If a subpoena:

(i) Requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) Requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court on behalf of which the subpoena was issued may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the Court may order appearance or production only upon specified conditions.

**(d) Duty in responding to subpoena.**

(1) If a subpoena does not specify a form for producing documents or electronically stored information, the person responding shall produce it in a form or forms in which it is ordinarily maintained, or in which it is reasonably usable. Absent a showing of good cause, the person responding need not produce the same documents or electronically stored information in more than one form. The person responding need not provide discovery of documents or electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On a motion to compel discovery or for a protective order, the person responding to a subpoena must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the Court nevertheless may order discovery from such sources if the requesting party shows good cause. The Court may specify the conditions for the discovery.(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, electronically stored information, or tangible things not produced that is sufficient to enable the demanding party to contest the claim.



CIVIL

SUBPOENA FOR THE PRODUCTION OF EVIDENCE

STATE OF GEORGIA  
FULTON COUNTY

TO: Georgia Institute of Technology  
Office of Legal Affairs  
760 Spring Street, N.W., Suite 324  
Atlanta, GA 30332-0495

RODNEY JOFFE, )  
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 Plaintiff, )  
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 v. )  
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 NEUSTAR, INC. and SECURITY SERVICES, )  
 LLC, )  
 )  
 Defendants. )

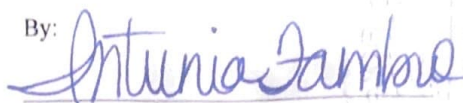
\_\_\_\_\_ )  
CASE NUMBER )

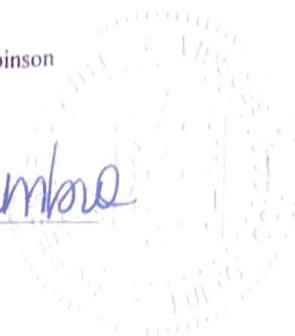
**YOU ARE HEREBY COMMANDED** to produce the documents identified in **Schedule A** hereto on or before May 10, 2023, at the offices of Young Conaway Stargatt & Taylor, LLP, 1000 North King Street, Wilmington, Delaware 19801, Attention: William E. Gamgort, Esq. A copy of a Stipulation and Order for the Production and Exchange of Confidential Information applicable to the documents requested by this Subpoena is attached as **Schedule B**.

The requested documents may be produced in electronic copy, which may be coordinated by contacting the foregoing counsel for Defendant Security Services, LLC. This subpoena is issued pursuant to the Uniform Interstate Depositions and Discovery Act, GA Code § 24-13-112, and relates to litigation pending in the Court of Chancery of the State of Delaware, C.A. No. 2022-1041-KSJM. Counsel of record for the parties in the foregoing litigation are identified below.

If you have questions, contact Attorney for Defendant  
Security Services, LLC  
William E. Gamgort, Esquire  
Young Conaway Stargatt & Taylor, LLP  
Rodney Square  
1000 N. King Street  
Wilmington, DE 19801  
(302) 571-6600

Honorable Cathelene "Tina" Robinson  
Clerk of Superior Court

By:   
Deputy Clerk



Attorneys Participating in the Case:

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Philadelphia, PA 19102  
Telephone: (215) 665-8700

*Counsel for Defendant Neustar, Inc.*

**IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE**

RODNEY JOFFE, )  
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 Plaintiff, )  
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 v. )  
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 NEUSTAR, INC. and SECURITY )  
 SERVICES, LLC, )  
 )  
 Defendants. )

**AFFIDAVIT OF SERVICE OF SUBPOENA UPON  
GEORGIA INSTITUTE OF TECHNOLOGY**

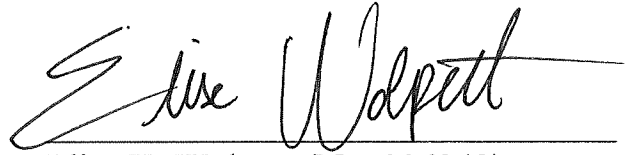
I, Elise K. Wolpert, do hereby state as follows:

1. I am an attorney with the law firm of Young Conaway Stargatt & Taylor, LLP, and I represent Defendant Security Services, LLC in the above-captioned action. I am admitted to practice before and am in good standing with the Bar of the Supreme Court of the State of Delaware.

2. I am over 21 years of age and fully competent to make this Affidavit.

3. Counsel for Defendant Security Services caused to be served the attached subpoena *duces tecum* upon non-party Georgia Institute of Technology. The subpoena was served upon Christian Fuller, counsel for Georgia Institute of Technology, on April 26, 2023 by agreement.

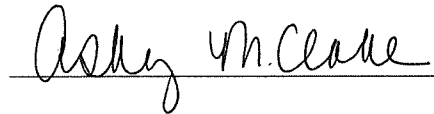
4. I declare under penalty of perjury under the laws of Delaware that the foregoing is true and correct.



Elise K. Wolpert (No. 006343)  
YOUNG CONAWAY STARGATT  
& TAYLOR, LLP  
Rodney Square  
1000 North King Street  
Wilmington, DE 19801  
(302) 571-6623

SWORN TO and SUBSCRIBED before me

this 11 day of May, 2023



Notary Public

My Commission expires: January 8, 2026

ASHLEY M. CLARKE  
NOTARY PUBLIC  
STATE OF DELAWARE  
My Commission Expires January 8, 2026