

**Electronically Filed
by Superior Court of CA,
County of Santa Clara,
on 5/13/2024 12:00 AM
Reviewed By: R. Walker
Case #20CV368472
Envelope: 15304128**

1 CHARIS LEX, P.C.
Sean Gates (Bar No. 186247)
2 sgates@charislex.com
155 N. Lake Avenue, Ste. 800
3 Pasadena, CA 91101
Telephone: 626-508-1715
4

5 QUINN EMANUEL URQUHART & SULLIVAN, LLP
Alex Spiro (*pro hac vice forthcoming*)
alexspiro@quinnemanuel.com
6 51 Madison Avenue, 22nd Floor
New York, New York 10010
7 Telephone: (212) 849-7000
8

9 *Counsel continued on next page*

10 Attorneys for Plaintiff Tesla, Inc.
11

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF SANTA CLARA

14 TESLA, INC.,

15 Plaintiff,

16 v.

17 RIVIAN AUTOMOTIVE, INC., RIVIAN
AUTOMOTIVE, LLC, VINCE DURAN, KIM
18 WONG, TAMI PASCALE, JESSIE YOSTE,
19 SAVAYIA BERO, JESSICA SIRON,
CARRINGTON BRADLEY, ANDREA
20 ZECHMAN, ASHWIN ALINKIL, SAIKAT
DAS, DAVID WU, and DOES 8-20,

21 Defendants.
22
23
24
25
26
27
28

CASE NO. 20-CV-368472

PROOF OF SERVICE

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
Melissa J. Baily (Bar No. 237649)
2 melissabaily@quinnemanuel.com
50 California Street, 22nd Floor
3 San Francisco, CA 94111
Telephone: (415) 875-6600
4 Facsimile: (415) 875-6700
5
Sara Pollock (Bar No. 281076)
6 sarapollock@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
7 Redwood Shores, California 94065-2139
Telephone: (650) 801-5000
8 Facsimile: (650) 801-5100
9
Michael T. Lifrak (Bar No. 232430)
michaellifrak@quinnemanuel.com
10 865 South Figueroa Street, 10th Floor
Los Angeles, California 90017-2543
11 Telephone: (213) 443-3000
Facsimile: (213) 443-3100
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 I am employed by Quinn Emanuel Urquhart & Sullivan in the County of Santa Clara, State
2 of California. I am over the age of 18 and not a party to this action. My business address is: 555
3 Twin Dolphin Dr., 5th Floor, Redwood City, California 94065. On May 11, 2024, I served the
4 following document(s) described as:

- 5 • **PLAINTIFF TESLA INC.’S RENEWED MOTION TO COMPEL DEFENDANTS
6 RIVIAN AUTOMOTIVE, INC. AND RIVIAN AUTOMOTIVE, LLC TO
7 PRODUCE INFORMATION REGARDING THEIR INVESTIGATIONS INTO
8 TESLA’S ALLEGATIONS [SEALED]**
- 9 • **PLAINTIFF TESLA INC.’S RENEWED MOTION TO COMPEL DEFENDANTS
10 RIVIAN AUTOMOTIVE, INC. AND RIVIAN AUTOMOTIVE, LLC TO
11 PRODUCE INFORMATION REGARDING THEIR INVESTIGATIONS INTO
12 TESLA’S ALLEGATIONS [PUBLIC]**
- 13 • **INDEX OF EXHIBITS TO PLAINTIFF TESLA INC.’S RENEWED MOTION TO
14 COMPEL DEFENDANTS RIVIAN AUTOMOTIVE, INC. AND RIVIAN
15 AUTOMOTIVE, LLC TO PRODUCE INFORMATION REGARDING THEIR
16 INVESTIGATIONS INTO TESLA’S ALLEGATIONS [SEALED]**
- 17 • **INDEX OF EXHIBITS TO PLAINTIFF TESLA INC.’S RENEWED MOTION TO
18 COMPEL DEFENDANTS RIVIAN AUTOMOTIVE, INC. AND RIVIAN
19 AUTOMOTIVE, LLC TO PRODUCE INFORMATION REGARDING THEIR
20 INVESTIGATIONS INTO TESLA’S ALLEGATIONS [PUBLIC]**

21 On the following parties in this action:

22 *SEE ATTACHED SERVICE LIST*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address bradyhuynh@quinnemanuel.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. I declare that I am employed in the office of a member of the bar of this court whose direction the service was made. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

1 Executed on May 11, 2024, at Santa Clara, California.

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

/s/ Brady Huynh
Brady Huynh

SERVICE LIST
Santa Clara Superior Court
Case No. 20CV368472

<p><i>Attorneys for Rivian Automotive Inc. and Rivian Automotive LLC</i></p>	<p>GOODWIN PROCTER LLP Darryl M. Woo (dwoo@goodwinlaw.com) Brett M. Schuman (bschuman@goodwinlaw.com) Rachel M. Walsh (rwalsh@goodwinlaw.com) Jeremy Lateiner (jlateiner@goodwinlaw.com) Megan D. Bettles (mbettles@goodwinlaw.com) Ishika Desai (idesai@goodwinlaw.com) Three Embarcadero Center, 28th Fl. San Francisco, CA 94111</p>
<p><i>Attorneys for Kim Wong, Tami Pascale, Savayia Bero, Vince Duran and Andrea Zechmann</i></p>	<p>BERGESON LLP Daniel J. Bergeson (dbergeson@be-law.com) Jaideep (Jay) Venkatesan (jvenkatesan@be-law.com) 111 N. Market St., Suite 600 San Jose, CA 95113</p>
<p><i>Attorneys for Carrington Bradley</i></p>	<p>NIXON PEABODY LLP Bruce E. Copeland (bcopeland@nixonpeabody.com) Stacey Boven (sboven@nixonpeabody.com) Eric Ferrante (eferrante@nixonpeabody.com) Sam Parrish (sparrish@nixonpeabody.com) One Embarcadero Center, 32nd Floor San Francisco, CA 94111</p>
<p><i>Attorneys for Jessica Siron</i></p>	<p>STRUCTURE LAW GROUP LLP Ryan Penhallegon (rpenhallegon@structurelaw.com) Austin T. Jackson (ajackson@structurelaw.com) 1754 Technology Drive, Suite 135 San Jose, CA 95110 Sonya Tamiry (stamiry@structurelaw.com) 1802 Century Park E., #574, Los Angeles, CA 90067</p>

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

<i>Attorneys for Jessie Yoste and David Wu</i>	LEWIS & LLEWELLYN LLP Marc R. Lewis (mlewis@lewisllewellyn.com) Rebecca F. Furman (bfurman@lewisllewellyn.com) Bradley E. Estes (bestes@lewisllewellyn.com) Sable Hodson (shodson@lewisllewellyn.com) 601 Montgomery Street, Suite 2000 San Francisco, CA 94111
<i>Attorneys for Ashwin Alinkil</i>	TYZ LAW GROUP Ryan Tyz (ryan@tyzlaw.com) Sean K. Apple (sapple@tyzlaw.com) Deborah Hedley (deborah@tyzlaw.com) 4 Embarcadero Center, 14 th Floor San Francisco, CA 94111
<i>Attorneys for Saikat Das</i>	SV EMPLOYMENT LAW FIRM PC Steven Friedlander (sfriedlander@svelf.com) Carl Kaplan (ckaplan@svelf.com) 160 Bovet Road, Suite 401 San Mateo, California 94402