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9720 Wilshire Boulevard, 5th Floor
Beverly Hills, California 90212

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May 3, 2016

VIA PERSONAL DELIVERY

Custodian of Records
CT Corporation System
c/o Glassdoor, Inc.
818 W. 7th Street, Ste. 930
Los Angeles, CA 90017

**Re: *Philip J. Layfield v. Does 1 through 25 et al.*
Los Angeles Superior Court Case No. BC618139**

Dear Custodian of Records:

Enclosed is a Deposition Subpoena for Production of Business Records regarding user information relevant to the above captioned case. The Subpoena is duly issued and is being served upon you pursuant to the California Discovery Act.

Because the records requested must be authenticated, I am also enclosing a form Declaration of Custodian of Records that you may use for that purpose, if your company does not have its own declaration that is compliant with California Evidence Code § 1561, which requires such declarations to include a description of the records produced and the mode of preparation.

Although the enclosed subpoena specifies production of records at our legal document reproduction company, you may instead make a direct production to our office. Also, I would be happy to provide you with electronic copies of any of the

Custodian of Records

May 3, 2016

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documents served herein or otherwise assist you as necessary and appropriate to reduce any burden associated with your response to the subpoena.

Thank you for your anticipated cooperation in this matter. Please contact our office with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Erik S. Syverson', with a long horizontal flourish extending to the right.

Erik S. Syverson
of RAINES FELDMAN LLP

Enclosed:

- Deposition Subpoena for Production of Business Records;
- Attachment "3" to Deposition Subpoena for Production of Business Records;
- Declaration of Custodian of Records

PLAINTIFF/PETITIONER: Philip J. Layfield and Layfield & Barrett APC. DEFENDANT/RESPONDENT: Does 1 through 25	CASE NUMBER: BC618139
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PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (*name*):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) Witness fees were paid.
Amount:..... \$ _____

(2) Copying fees were paid.
Amount:..... \$ _____

f. Fee for service:..... \$ _____

2. I received this subpoena for service on (*date*):

3. Person serving:

- a. Not a registered California process server.
- b. California sheriff or marshal.
- c. Registered California process server.
- d. Employee or independent contractor of a registered California process server.
- e. Exempt from registration under Business and Professions Code section 22350(b).
- f. Registered professional copier.
- g. Exempt from registration under Business and Professions Code section 22451.
- h. Name, address, telephone number, and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:

Date:

▶ _____

▶ _____

(SIGNATURE)

(SIGNATURE)

1 ATTACHMENT "3"

2 TO DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS

3 DEFINITIONS AND INSTRUCTIONS

4 1. "DOCUMENT" or "DOCUMENTS" refers to writings as defined by California
5 Evidence Code § 250 and includes, but is not limited to, the original and all drafts of all written or
6 graphic matter, however produced or reproduced, of any kind of description, and all copies thereof
7 which are different from the original (whether different by interlineation, receipt stamp, notation,
8 indication of copies sent or received, or otherwise), whether printed or recorded electronically or
9 magnetically or reproduced by hand.

10 2. The term "PERSON" shall mean and include all natural persons, as well as
11 corporations, partnerships, and other business entities.

12 3. The phrases "RELATE TO," "RELATING TO," or "RELATED TO" as used
13 herein, shall mean, in whole or in part, constituting, containing, embodying, reflecting, regarding
14 referring to, concerning, identifying, stating, implying, evidencing, supporting, documenting,
15 memorializing, mentioning, or in any way relating or pertaining to, the subject designated.

16 4. The terms "ANY," "EACH," or "ALL" shall be read to be all inclusive and to
17 require the production of each and every DOCUMENT responsive to a particular request for
18 production in which such term appears.

19 5. The terms "YOU" AND "YOUR" as used herein, shall mean and refer to
20 Glassdoor, Inc., the entity that owns the website www.glassdoor.com, and YOUR present and
21 former agents, representatives, employees, attorneys, accountants, auditors, investigators, and all
22 other person(s) acting or purporting to act on YOUR behalf.

23 6. The phrase "IDENTIFYING INFORMATION" as used herein, shall mean any
24 information that can be used to identify individuals, including, but not limited to, names,
25 addresses, telephone numbers, email addresses, usernames, Internet Protocol ("IP") addresses,
26 server log entries, methods of payment, credit card information, billing records, and any Internet
27 Service Providers ("ISP") associated with these individuals.
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1 reviews”, that appeared at [https://www.glassdoor.com/Reviews/Layfield-and-Wallace-Reviews-](https://www.glassdoor.com/Reviews/Layfield-and-Wallace-Reviews-E1004618.htm)
2 E1004618.htm.

3 **REQUEST FOR PRODUCTION NO. 4:**

4 ANY and ALL DOCUMENTS in YOUR possession, custody, or control, that state, list,
5 describe, or refer to IDENTIFYING INFORMATION RELATED TO the PERSON(S) who
6 authored, submitted for publication or posted to YOUR website, www.glassdoor.com, the review
7 dated October 9, 2015 and entitled “Working Here is Psychological Torture”, that appeared at
8 <https://www.glassdoor.com/Reviews/Layfield-and-Wallace-Reviews-E1004618.htm>

9 **REQUEST FOR PRODUCTION NO. 5:**

10 ANY and ALL DOCUMENTS in YOUR possession, custody, or control, that state, list,
11 describe, or refer to IDENTIFYING INFORMATION RELATED TO the PERSON(S) who
12 authored, submitted for publication or posted to YOUR website, www.glassdoor.com, the review
13 dated September 27, 2015 and entitled “New Admitees Beware”, that appeared at
14 <https://www.glassdoor.com/Reviews/Layfield-and-Wallace-Reviews-E1004618.htm>

15 **REQUEST FOR PRODUCTION NO. 6:**

16 ANY and ALL DOCUMENTS in YOUR possession, custody, or control, that state, list,
17 describe, or refer to IDENTIFYING INFORMATION RELATED TO the PERSON(S) who
18 authored, submitted for publication or posted to YOUR website, www.glassdoor.com, the review
19 dated September 7, 2015 and entitled “For the love of God, do NOT work here”, that appeared at
20 https://www.glassdoor.com/Reviews/Layfield-and-Wallace-Reviews-E1004618_P2.htm.

21 **REQUEST FOR PRODUCTION NO. 7:**

22 ANY and ALL DOCUMENTS in YOUR possession, custody, or control, that state, list,
23 describe, or refer to IDENTIFYING INFORMATION RELATED TO the PERSON(S) who
24 authored, submitted for publication or posted to YOUR website, www.glassdoor.com, the review
25 dated August 3, 2015 and entitled “Anyone who give this place a full rating has literally just started
26 working there”, that appeared at [https://www.glassdoor.com/Reviews/Layfield-and-Wallace-](https://www.glassdoor.com/Reviews/Layfield-and-Wallace-Reviews-E1004618_P2.htm)
27 [Reviews-E1004618_P2.htm](https://www.glassdoor.com/Reviews/Layfield-and-Wallace-Reviews-E1004618_P2.htm).

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1 **REQUEST FOR PRODUCTION NO. 8:**

2 ANY and ALL DOCUMENTS in YOUR possession, custody, or control, that state, list,
3 describe, or refer to IDENTIFYING INFORMATION RELATED TO the PERSON(S) who
4 authored, submitted for publication or posted to YOUR website, www.glassdoor.com, the review
5 dated August 1, 2015 and entitled "Working for Philip J. Layfield (a.k.a Philip S. Pesin) was pure
6 misery", that appeared at [https://www.glassdoor.com/Reviews/Layfield-and-Wallace-Reviews-](https://www.glassdoor.com/Reviews/Layfield-and-Wallace-Reviews-E1004618_P2.htm)
7 [E1004618_P2.htm](https://www.glassdoor.com/Reviews/Layfield-and-Wallace-Reviews-E1004618_P2.htm).

8 **REQUEST FOR PRODUCTION NO. 9:**

9 ANY and ALL DOCUMENTS in YOUR possession, custody, or control, that state, list,
10 describe, or refer to IDENTIFYING INFORMATION RELATED TO the PERSON(S) who
11 authored, submitted for publication or posted to YOUR website, www.glassdoor.com, the review
12 dated May 28, 2015 and entitled "Horrible place to work. Unreasonably Cruel", that appeared at
13 https://www.glassdoor.com/Reviews/Layfield-and-Wallace-Reviews-E1004618_P2.htm.

14 **REQUEST FOR PRODUCTION NO. 10:**

15 ANY and ALL DOCUMENTS in YOUR possession, custody, or control, that state, list,
16 describe, or refer to IDENTIFYING INFORMATION RELATED TO the PERSON(S) who
17 authored, submitted for publication or posted to YOUR website, www.glassdoor.com, the review
18 dated October 7, 2015 and entitled "Phil Layfield Changed His Name from Phil Pesin for a
19 Reason", that appeared at [https://www.glassdoor.co.uk/Reviews/Employee-Review-Layfield-and-](https://www.glassdoor.co.uk/Reviews/Employee-Review-Layfield-and-Wallace-RVW8216896.htm)
20 [Wallace-RVW8216896.htm](https://www.glassdoor.co.uk/Reviews/Employee-Review-Layfield-and-Wallace-RVW8216896.htm).

21 **REQUEST FOR PRODUCTION NO. 11:**

22 ANY and ALL DOCUMENTS in YOUR possession, custody, or control, that state, list,
23 describe, or refer to IDENTIFYING INFORMATION RELATED TO the PERSON(S) who
24 authored, submitted for publication or posted to YOUR website, www.glassdoor.com, the review
25 dated March 21, 2016 and entitled "Layfield & Barrett, wallace or pesin STAY AWAY!!! BAD
26 BOSS", that appeared at [https://www.glassdoor.com/Reviews/Layfield-and-Barrett-Reviews-](https://www.glassdoor.com/Reviews/Layfield-and-Barrett-Reviews-E1150756.htm)
27 [E1150756.htm](https://www.glassdoor.com/Reviews/Layfield-and-Barrett-Reviews-E1150756.htm).

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1 **REQUEST FOR PRODUCTION NO. 12:**

2 ANY and ALL DOCUMENTS in YOUR possession, custody, or control, that state, list,
3 describe, or refer to IDENTIFYING INFORMATION RELATED TO the PERSON(S) who
4 authored, submitted for publication or posted to YOUR website, www.glassdoor.com, the review
5 dated April 2, 2016 and entitled "Don't let the name change fool you, read the reviews for
6 Layfield & Wallace. This is Phil Pesin's way of 'starting fresh'", that appeared at
7 <https://www.glassdoor.com/Reviews/Layfield-and-Barrett-Reviews-E1150756.htm>.

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES**

PHILIP J. LAYFIELD, an individual and
LAYFIELD & BARRETT, APC., a California
professional corporation,

Plaintiffs,

v.

DOES 1 through 25, inclusive,

Defendants.

CASE NO. BC618139

[Unlimited Jurisdiction]

**DECLARATION OF CUSTODIAN OF
RECORDS FOR AUTOMATTIC, INC.,
PURSUANT TO CALIFORNIA EVIDENCE
CODE § 1561**

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DECLARATION OF CUSTODIAN OF RECORDS

I, _____, declare and state as follows:

1. I am the duly authorized custodian of records for Glassdoor, Inc., and I have authority to certify such records.

2. My business address is _____

3. I was served with a civil subpoena duces tecum in the above-captioned proceeding (the "Subpoena").

4. The copies produced in response to the Subpoena are true and correct copies of all records requested in the Subpoena, which are in my possession as custodian of records.

5. The original records from which the accompanying copies were made have been prepared by _____ in the ordinary course of business at or near the times of the acts, conditions or events recorded therein.

6. The records are identified as follows: _____

7. The following is a description of the mode of preparation: _____

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on _____, 2016, at _____

Declarant