

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

TEOCO Corporation,)	
)	
Plaintiff,)	
v.)	
)	
Razorsight Corporation, Sundeep Sanghavi and Shital Sanghavi,)	
)	
Defendants.)	
)	
and)	
)	
Razorsight Corporation,)	
)	
Counterclaimant,)	
)	
v.)	
)	
TEOCO Corporation and Atul Jain,)	
)	
Counterclaim Defendants.)	

Case No.: 1:07cv887 CMH/BRP

**DEFENDANT SHITAL SANGHAVI’S OBJECTIONS AND
RESPONSES TO PLAINTIFF TEOCO’S FIRST SET OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and Local Rule 26 of the United States District Court for the Eastern District of Virginia, Defendant Shital Sanghavi (“Mrs. Sanghavi” or “Defendant”), by counsel, serves her Objections and Answers to Plaintiff TEOCO Corporation’s (“TEOCO” or “Plaintiff”) First Set of Interrogatories to the extent the Answers are not subject to objection and states as follows.¹ Mrs. Sanghavi also incorporates by reference and restates all of her previously noted General Objections hereto.

¹ Mrs. Sanghavi incorporates by reference and restates in full the defined terms set forth in Sundeep Sanghavi’s written discovery to TEOCO.

INTERROGATORIES

1. Identify all TEOCO information, documents, and software, including TEOCO proprietary materials, that was at any time in your possession after September 27, 2002.

OBJECTION: Without waiving her previously noted general objections, Mrs. Sanghavi objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, seeks information that is irrelevant and/or immaterial, and is not calculated to lead to the discovery of admissible evidence to the extent it requests that Mrs. Sanghavi identify all TEOCO information, documents, and software, including TEOCO proprietary materials, that was at any time in her possession after September 27, 2002 when only a limited amount of such information, documents, software, and “proprietary materials” are at issue in this action. Mrs. Sanghavi also objects to this Interrogatory on the grounds that the term “TEOCO proprietary materials” is vague and ambiguous. Mrs. Sanghavi also incorporates by reference and restates in full General Objections 4 and G set forth above.

ANSWER: Subject to and without waiving her previously noted General and Specific Objections, Mrs. Sanghavi states as follows:

With respect to the materials and items identified in the Amended Complaint, the following were in Mrs. Sanghavi’s possession after September 27, 2002: TEOCO data loader source code, STIGMA object code, TEOCO data model script, TEOCO data base sequence script, a TEOCO log file, and a TEOCO CABS loader for CABS version 37.

2. Describe all facts and circumstances surrounding your, or any other defendant’s, acquisition of the items identified in your response to Interrogatory No. 1.

OBJECTION: Without waiving her previously noted general objections, Mrs.

Sanghavi objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, seeks information that is irrelevant and/or immaterial, and is not calculated to lead to the discovery of admissible evidence to the extent it requests that Mrs. Sanghavi describe all facts and circumstances surrounding her, or any other defendant's, acquisition of the items identified in your response to Interrogatory No. 1. Mrs. Sanghavi shall only provide information concerning her and such information shall be limited to the information, documents, software, and "proprietary materials" are at issue in this action. Mrs. Sanghavi also objects to this Interrogatory to the extent it requests disclosure of information protected from disclosure by the marital communications privilege.

ANSWER: Subject to and without waiving her previously noted General and Specific Objections, Mrs. Sanghavi states as follows:

With respect to the STIGMA object code, Mrs. Sanghavi was provided access to STIGMA by Wayne Phares, a co-worker of hers while she was employed by TEOCO, and the testing tool was placed on her machine. Mrs. Sanghavi cannot recall precisely how she was provided access to STIGMA, but she did not improperly access STIGMA as alleged in the Amended Complaint. Rather, Mr. Phares either accessed what was called the TEOCO "QA Server" using Mrs. Sanghavi's TEOCO work computer and copied the STIGMA tool to that machine, or Mrs. Sanghavi accessed the "QA Server" herself with Mr. Phares' full knowledge and approval and copied the STIGMA tool to her machine. To be clear, there was no surreptitious or unauthorized access on the part of Mrs. Sanghavi to the STIGMA tool while she was employed by TEOCO as is suggested in the Amended Complaint.

In or around March 2003, Mrs. Sanghavi and Dharmesh Trivedi, both then

Razorsight employees, were responsible for designing and building a Razorsight product called AIM Capture, under the direction of Shawn Gallagher. Mrs. Sanghavi developed parser technology and Mr. Trivedi aided in the project by providing functional requirements of SECAB. The parser code designed to convert a paper invoice or bill to SECAB output format was written by Razorsight employees, specifically Mrs. Sanghavi. Once SECAB output was obtained, this output needed to be tested. At this time, Mrs. Sanghavi provided Razorsight with STIGMA, as a tool to test the SECAB output in the initial designs of AIM Capture. STIGMA was not incorporated into any Razorsight product.

With respect to the TEOCO data loader source code, Mrs. Sanghavi took a copy of this with her at the time her employment with TEOCO ended.

After the AIM Capture parsers were built, the paper to SECAB conversion process was automated, and various supporting applications were included with the AIM Capture program. Some of these supporting applications, also known as “framework,” contained utility and system configuration files. Some of this “framework” was taken from a TEOCO data loader, but Mrs. Sanghavi believes at this time, that part of the loaders used in the framework were generic and widely available from sources other than TEOCO.

With respect to the TEOCO data model script, Mrs. Sanghavi received this from a TEOCO employee on or about March 20, 2003 via e-mail. Mrs. Sanghavi refers TEOCO to the documents that she will produce in the course of discovery in this litigation. Mrs. Sanghavi is not entirely sure as to why she requested this data model script, but she believes she requested the script in conjunction with her work to load invoice files into a data model with which she was working.

With respect to the TEOCO log file, Mrs. Sanghavi received this from a TEOCO employee named Jitendra Kalyandurg. Mrs. Sanghavi refers TEOCO to the documents that she will produce in the course of discovery in this litigation. Mr. Kalyandurg was experiencing difficulties with software bugs in a module with which Mrs. Sanghavi worked while she was employed by TEOCO, and she received the log file from him to assist him in “debugging” the module.

With respect to the TEOCO CABS loader for CABS version 37, which was not being used by TEOCO when it was provided to Mrs. Sanghavi by Mr. Kalyandurg on or about September 22, 2003, Mrs. Sanghavi refers TEOCO to the documents that she will produce in the course of discovery in this litigation. The reason this loader was requested was that as a part of the initial phases of the work performed by Razorsight after it was awarded a contract by Verizon to build Online BillViewer, some of the invoices received from Verizon were in CABS version 37. This loader was requested for the purpose of Razorsight having to avoid reconstructing a CABS version 37 loader, which at that time, was practically obsolete. This loader was used in connection with the development of the Online BillViewer by Razorsight for Verizon.

With respect to the TEOCO DB Sequence Script, this was received by Mrs. Sanghavi from an employee of TEOCO on or about March 20, 2003. Mrs. Sanghavi refers TEOCO to the documents that she will produce in the course of discovery in this litigation. Mrs. Sanghavi is not entirely sure as to why she requested this sequence script, but she believes she requested the sequence script in conjunction with her work to load invoice files into a data model with which she was working

3. Describe all facts and circumstances surrounding your, or any other

defendant's, destruction or other disposition of the items identified in your response to Interrogatory No. 1.

OBJECTION: Without waiving her previously noted general objections, Mrs. Sanghavi objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, seeks information that is irrelevant and/or immaterial, and is not calculated to lead to the discovery of admissible evidence to the extent it requests that Mrs. Sanghavi describe all facts and circumstances surrounding her, or any other defendant's, acquisition of the items identified in your response to Interrogatory No. 1. Mrs. Sanghavi shall only provide information concerning her and such information shall be limited to the information, documents, software, and "proprietary materials" are at issue in this action.

ANSWER: Subject to and without waiving her previously noted General and Specific Objections, Mrs. Sanghavi states as follows:

Mrs. Sanghavi has not destroyed or disposed of any of the TEOCO property previously listed in her Answer to TEOCO Interrogatory 1. Mrs. Sanghavi notes that when she left TEOCO, she had a copy of the tool known as STIGMA and TEOCO data loader source code on a CD ROM disk. Mrs. Sanghavi is unable to locate this disk.

4. Describe all facts and circumstances surrounding your, or any other defendant's, use of the items identified in your response to Interrogatory No. 1, including any copying of those items, distribution of those items, and incorporation of those items, in whole or in part, into any Razorsight software.

OBJECTION: Without waiving her previously noted general objections, Mrs. Sanghavi objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, seeks information that is irrelevant and/or immaterial, and is not calculated to

lead to the discovery of admissible evidence to the extent it requests that Mrs. Sanghavi all facts and circumstances surrounding her, or any other defendant's, use of the items identified in your response to Interrogatory No. 1, including any copying of those items, distribution of those items, and incorporation of those items, in whole or in part, into any Razorsight software. Mrs. Sanghavi shall only provide information concerning her and such information shall be limited to the information, documents, software, and "proprietary materials" are at issue in this action.

ANSWER: Subject to and without waiving her previously noted General and Specific Objections, Mrs. Sanghavi states as follows:

With respect to STIGMA object code, TEOCO data model script, TEOCO log file, TEOCO CABS loader version 37, and TEOCO DB Sequence Script, Mrs. Sanghavi refers TEOCO to her response in Interrogatory No. 2.

With respect to the TEOCO data loader source code, this was used by Razorsight for the purpose of providing a demonstration of a Proof of Concept to Verizon in June 2003. Razorsight also referred to this source code in its construction of its own data loader in connection with its work to develop AIM Capture. From July 2003 through November 2003, Mrs. Sanghavi was on maternity leave. During this time, the team assigned to the Verizon Online BillViewer contract continued their work to meet the demands of the contract. During her maternity leave, Mrs. Sanghavi was in contact with one of team members—Kalicharan Bhagwati—and she referred him to TEOCO data loader source code as a point of reference in Razorsight's development of its CABS loader source code being used as a part of the overall building of the Razorsight Online BillViewer. When she returned from maternity leave, Mrs. Sanghavi continued her efforts in making the BillViewer more "scalable," or in other words

capable of handling a greater volume of invoice data. No TEOCO code was used in the “scaling” process.

In or around February 2004, Mrs. Sanghavi and Sasikant Tenneti began to discuss how to design ADRAP (which stands for Audit Dispute Reconcile Allocate Pay) for the enterprise market. These discussions were entirely conceptual. Specifically, these talks were focused on how to construct a “scalable and pluggable” ADRAP module regardless of the underlying structure of the invoice data model on which ADRAP would be conceptually based. Mrs. Sanghavi and Mr. Tenneti, along with Mr. Sanghavi, Dharmesh Trivedi, Shawn Gallagher, Robert Duncan, and Kali Kalihran looked at the CAB manual with respect to the definitions for layout of the invoices in order to design an Invoice data model for the enterprise market. This data model was built from the existing BillViewer data model. This data model was planned by Mrs. Sanghavi and others based upon the existing BillViewer data model; Mrs. Sanghavi did not undertake the programming and construction of ADRAP components, which she understands did not occur until after April 2004. The end result was a data model with new application tables, new table names, field names, definitions and relationships.

As part of that same effort, Mrs. Sanghavi and Mr. Tenneti also altered the source code of the SECAB and EDI 811 loaders to which they had access so that invoice data could be loaded into the Razorsight data model constructed for the enterprise market.

5. If you contend that the Manuals, the Data Model and EDI 811 are not copyrightable works, explain all bases for that contention.

OBJECTION: Mrs. Sanghavi has no specific objection to this Interrogatory.

ANSWER: Subject to and without waiving her previously noted General Objections, Mrs. Sanghavi states that discovery in this action is ongoing. Mrs.

Sanghavi incorporates by reference and restates the answer provided by Razorsight to Interrogatory No. 5 served by TEOCO on Razorsight. This answer may be supplemented.

6. Describe your relationship with Razorsight, including the terms of your employment and your role and responsibilities at Razorsight.

OBJECTION: Mrs. Sanghavi has no specific objection to this Interrogatory.

ANSWER: Subject to and without waiving her previously noted General Objections, Mrs. Sanghavi states as follows:

Mrs. Sanghavi became employed at Razorsight in or around October 2002, and she was hired to assist with the Allegiance Telecom contract with Razorsight. Specifically with respect to the Allegiance Telecom contract, Mrs. Sanghavi was tasked with building the web based reports in ASP, a computer programming language, utilizing an Oracle database.

In 2003, Mrs. Sanghavi began working on AIM Capture, and she was a member of the Razorsight team responsible for designing, developing, and delivering AIM Capture. From May until October 2004, Mrs. Sanghavi was on leave from Razorsight. She returned to the company in or around October 2004, and at that time, she resumed her work on AIM Capture, particularly with respect to making the program more scalable in a production environment, as well as automating some of the Quality Assurance processes.

In or around April 2005, Mrs. Sanghavi became responsible for overseeing the product development for both AIM Capture and AIM Analytics. At that time, she was given the title of Director of Product Development. Mrs. Sanghavi held this position until her departure from Razorsight in or around May 2006.

7. Detail your ownership, if any, of Razorsight shares from 2001 through the

present.

OBJECTION: Without waiving her previously noted general objections, Mrs. Sanghavi objects to this Interrogatory on the grounds that it seeks information that is irrelevant and/or immaterial, and is not calculated to lead to the discovery of admissible evidence.

ANSWER: Subject to and without waiving her previously noted General Objections and Specific Objections, Mrs. Sanghavi states that she has never had an ownership interest in Razorsight.

8. Describe your relationship with TEOCO, including the terms of your employment, your role and responsibilities at TEOCO, and the circumstances surrounding the cessation of your relationship with TEOCO.

OBJECTION: Mrs. Sanghavi has no specific objection to this Interrogatory.

ANSWER: Subject to and without waiving her previously noted General Objections, Mrs. Sanghavi states as follows:

Mrs. Sanghavi began her employment with TEOCO in and around March 2000. Her direct supervisor at that time was Mark Wiseman, and she was assigned to the "DataLoader" team. The Team was assembled to build, design, and develop a new data loader for TEOCO in Java format. In 2000, Mrs. Sanghavi was responsible for the data loader application development with focus on developing the Scheduler and the GUI application. Mrs. Sanghavi also worked on various other aspects of data loaders at TEOCO. In the course of this work, she was also responsible for architectural design, coding, unit testing, requirements gathering, and code inspection.

Outside of her day-to-day duties and responsibilities at TEOCO, Mrs. Sanghavi also assisted TEOCO's Q&A team with regression testing. In 2001, Mrs. Sanghavi was also

responsible for “full life cycle development” of data loader modules, which included working on business and functional requirements of data loaders, module design, design documentation, walkthroughs, coding, and testing for the data loader application. Mrs. Sanghavi also worked with key modules of the data loader, and she also was tasked with developing interface modules. In or around April 2002, Mrs. Sanghavi changed her employment status at TEOCO from full time to part time. Mrs. Sanghavi refers TEOCO to documents that she will produce in the course of discovery.

Mrs. Sanghavi left TEOCO to pursue other personal interests, including educational interests and the desire to spend more time at home with her family.

Respectfully submitted,

SHITAL SANGHAVI

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CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing Objections and Answers to Interrogatories served by TEOCO Corporation on Shital Sanghavi were served by e-mail, this 4th day of February, 2008, on the following:

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