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8 Attorney for Plaintiff  
 9 IO GROUP, INC.

10 **UNITED STATES DISTRICT COURT**  
 11 **NORTHERN DISTRICT OF CALIFORNIA**  
 12 **SAN JOSE DIVISION**

11		)	
12	IO GROUP, INC., a California corporation,	)	<b>C-06-03926 (HRL)</b>
13	Plaintiff,	)	<b>DECLARATION OF GILL SPERLEIN IN</b>
14		)	<b>SUPPORT REPLY TO DEFENDANT’S</b>
15	vs.	)	<b>OPPOSITION TO PLAINTIFF’S</b>
16		)	<b>MOTION FOR SUMMARY JUDGMENT</b>
17	VEOH NETWORKS, Inc., a California	)	
18	Corporation,	)	DATE: September 4, 2007
19	Defendant.	)	TIME: 10:00 a.m.
20		)	COURTROOM: 2
21		)	
22		)	
23		)	
24		)	
25		)	
26		)	
27		)	
28		)	

21 I, GILL SPERLEIN, declare:

22 1. I am an attorney at law licensed to practice in the State of California and attorney of

23 record for Plaintiff Io Group, Inc.

24 2. Attached hereto as **Exhibit A** is a true and correct copy of the relevant excerpted

25 pages of the deposition transcript of Defendant Veoh Network’s Director of Product Development,

26 Joseph Papa, who testified on behalf of Defendant Veoh Networks, Inc. under F.R.C.P. 30(b)(6).

27 The excerpted deposition pages accurately reflect the questions asked and the answers given

28

1 during depositions which I took on May 21 and 22, 2007, in San Diego, California. Defendant's  
2 deposition was reported by Nicole R. Harnish, RPR, CSR No. 13101.

3 3. Attached hereto as **Exhibit B** is a true and correct copy of the relevant excerpted  
4 pages of the deposition transcript of Mr. John Styn ("Styn") a paid consultant of Defendant Veoh  
5 Network. The excerpted deposition pages accurately reflect the questions asked and the answers  
6 given during the Styn deposition which I took on May 31, in San Diego, California. Mr. Styn's  
7 deposition was reported by Regina L. Garrison, RPR, CSR No. 12921.

8 4. These pages supplement excerpted pages filed with Plaintiff's Motion for Summary  
9 Judgment, and Plaintiff's Opposition to Defendant's Motion for Summary Judgment.

10 5. Attached here to as **Exhibit C** is a true and complete copy of the Complaint for  
11 declaratory relief filed on August 9, 2007 by Defendant in the Southern District of California  
12 against UMG Recordings, Inc. et al. I downloaded this complaint directly from the Southern  
13 District's e-filing system.  
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19 Pursuant to the laws of the United States, I declare under penalty of perjury the  
20 foregoing is true and correct.  
21

22  
23 Dated: *August 21, 2007*

*/s/ Gill Sperlein*

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25 \_\_\_\_\_  
26 GILL SPERLEIN,  
27 Attorney for Plaintiff  
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