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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,)	C-06-03926 (HRL)
13	Plaintiff,)	DECLARATION OF GILL SPERLEIN IN
14)	SUPPORT OF PLAINTIFF'S MOTION
15	vs.)	FOR SUMMARY JUDGMENT ON
16)	LIABILITY
17	VEOH NETWORKS, Inc., a California Corporation,)	DATE: April 10, 2007
18	Defendant.)	TIME: 10:00 a.m.
19)	COURTROOM: 2
20)	

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

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

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 a. Attached hereto as **Exhibit B** is a true and correct copy of Exhibit 3 to the
4 Defendant's deposition;
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6 b. Attached hereto as **Exhibit C** is a true and correct copy of Exhibit 11 to the
7 Defendant's deposition;

8 c. Attached hereto as **Exhibit D** is a true and correct copy of Exhibit 16 to the
9 Defendant's deposition.
10

11 3. Attached hereto as **Exhibit E** is a true and correct copy of the relevant excerpted
12 pages of the deposition transcript of Defendant Veoh Network's Chief Scientific Officer, Dr. Ted
13 Dunning ("Dunning"). The excerpted deposition pages accurately reflect the questions asked and
14 the answers given during the Dunning deposition which I took on March 16, 2007, in San Diego,
15 California. Dr. Dunning's deposition was reported by Rita Burgess, RPR, CSR No. 8374.
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17 4. Attached hereto as **Exhibit F** is a true and correct copy of the relevant excerpted
18 pages of the deposition transcript of Defendant Veoh Network's Chief Executive Officer, Dmitry
19 Shapiro ("Shapiro") who testified on behalf of Veoh Networks under F.R.C.P. 30(b)(6). The
20 excerpted deposition pages accurately reflect the questions asked and the answers given during the
21 Shapiro deposition which I took on May 21, in San Diego, California. Mr. Shapiro's deposition
22 was reported by Nicole R. Harnish, RPR, CSR No. 13101.
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24 a. Attached hereto as **Exhibit G** is a true and correct copy of Exhibit 5 to the
25 Shapiro deposition.
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27 5. Attached hereto as **Exhibit H** is a true and correct copy of the relevant excerpted
28 pages of the deposition transcript of Mr. John Styn ("Styn") a paid consultant of Defendant Veoh

1 Network. The excerpted deposition pages accurately reflect the questions asked and the answers
2 given during the Styn deposition which I took on May 31, in San Diego, California. Mr. Styn's
3 deposition was reported by Regina L. Garrison, RPR, CSR No. 12921.
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5 6. Attached hereto as **Exhibit I** is a true and correct copy of the relevant excerpted
6 pages of the deposition transcript of Mr. Arthur Bilger ("Bilger"), who testified on behalf of
7 Shelter Capital Partners, LLC, under F.R.C.P. 30(b)(6). The excerpted deposition pages
8 accurately reflect the questions asked and the answers given during the Bilger deposition which I
9 took on June 5, 2007, in El Segundo, California. Mr. Bilger's deposition was reported by Chia
10 Mei Jui, RPR, CSR No. 3287.
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13 Pursuant to the laws of the United States, I declare under penalty of perjury the
14 foregoing is true and correct.
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17 Dated: *July 31, 2007*

/s/ Gill Sperlein

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GILL SPERLEIN,
Attorney for Plaintiff

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