

EXHIBIT “B”

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
TEXARKANA DIVISION

JOHN WARD, JR.

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C. A. NO. 08-4022
JURY TRIAL DEMANDED

v.

CISCO SYSTEMS, INC.

**DECLARATION OF RICHARD FRENKEL IN SUPPORT OF
DEFENDANT CISCO SYSTEMS, INC.'S RESPONSE TO PLAINTIFF'S
MOTION TO COMPEL COMPLIANCE WITH THE COURT'S
MARCH 30, 2009 ORDER AND FOR SANCTIONS AND MOTION TO
AMEND OR CLARIFY ITS MARCH 30, 2009 ORDER REGARDING
WAIVER OF ATTORNEY-CLIENT PRIVILEGE**

I, RICHARD FRENKEL, declare and state as follows:

1. My name is Richard Frenkel. I am over twenty-one years of age, competent in all respects and authorized to execute this Declaration. All of the matters stated herein are true and correct and are within my personal knowledge.

2. I am a former employee of Cisco Systems, Inc. ("Cisco") and am the author of the articles that are at issue in the above-referenced litigation.

3. I have read Cisco's amended answer to Interrogatory five in the above-referenced case, and I hereby verify that Cisco's answer to Interrogatory five is accurate as to what I relied upon in writing the subject articles, except that, as indicated by Cisco in the above-referenced response, item 1 listed for the October 18 article should be listed as item 12 for the October 17 article and Amanda Ernst should not have been listed under item 5 under the October 17 article. Ms. Ernst was properly listed under item 4 under the October 17 article as she was the author of the October 16 IP Law360 article.

4. In the October 18 article, when I wrote that I “checked” and “that’s exactly what happened,” I was referring to having “checked” items identified by Cisco in its amended answer to Interrogatory 5 as items 4-6 and 8-10 for the October 18 article.

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

Executed on May 11, 2009.

A handwritten signature in cursive script, appearing to read "Richard Frenkel", written in black ink on a white background.

Richard Frenkel