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 Perfect 10, Inc.  
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8 UNITED STATES DISTRICT COURT  
 9 CENTRAL DISTRICT OF CALIFORNIA  
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11 PERFECT 10, INC., a California  
 corporation,  
 12  
 Plaintiff,  
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 v.  
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 15 GOOGLE INC., a corporation; and  
 DOES 1 through 100, inclusive,  
 16  
 Defendants.  
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MASTER FILE NO. CV04-9484 AHM  
 (SHX)

**Declaration of Dr. Norman Zada In  
 Support Of Plaintiff Perfect 10, Inc.’s  
 Reply Memorandum Of Points And  
 Authorities For Its Motion for Review  
 and Reconsideration of Portions of  
 Magistrate Judge Hillman’s Order of  
 February 22, 2008 Granting in Part  
 Perfect 10’s Motion to Compel  
 Defendant Google, Inc. to Produce  
 Documents, and Objections Thereto**

18 AND CONSOLIDATED CASE  
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[Memorandum Of Points And Authorities  
 and Declaration Of Jeffrey N. Mausner  
 Submitted Concurrently Herewith]

Date: April 14, 2008  
 Time: 10:00 A.M.  
 Place: Courtroom of Judge Matz

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I, Norman Zada, declare as follows:

1. I am the President of Plaintiff Perfect 10, Inc. (“Perfect 10”). I have been very involved in the prosecution of this case and am very familiar with all aspects of it, including the production of documents by Perfect 10 and by Google. All of the matters stated herein are of my own personal knowledge, except where otherwise stated, and if called as a witness, I could and would testify competently thereto.

2. Perfect 10 has taken the position in this litigation that it will make every reasonable effort to produce all relevant documents requested of it. Attached as Exhibit 1 is a true and correct example of some of Perfect 10’s discovery responses. As can be seen, on these sample pages, we have agreed to produce documents in response to every request.

3. Perfect 10 has produced over 1,200,000 pages of documents to Google in this litigation, containing more than 1,100,000 copies of full-size Perfect 10 copyrighted works on websites to which Google links and/or receives advertising payments. Perfect 10 has produced tax returns, financial statements, server logs, and a vast quantity of other documents. In contrast, aside from multiple copies of Perfect 10’s own notices of infringement, Google has produced few documents other than approximately 3,000 pages of third party notices.

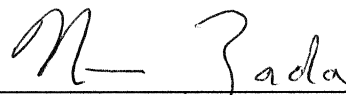
4. Most of the infringement of Perfect 10 copyrighted images has occurred on websites to which Google links and/or receives advertising payments, which I will refer to as “download” sites. There are at least thirty-nine download sites which have been Google AdWords advertisers, which have infringed at least 15,000 Perfect 10 images each. Virtually all of these sites offer billions of dollars in stolen full-length movies, songs, computer software, and images. There are at least 30 additional download sites to which Google has linked and/or displayed Perfect 10 images from, that have also infringed thousands of Perfect 10 images

1 each. I have sent to Google in my DMCA notices, over 800,000 copies of  
2 infringing images from those websites. I have also included in my notices to  
3 Google, evidence that such sites infringe thousands of full-length movies and songs.  
4 From my experience, download sites that offer pirated movies, songs, and computer  
5 software, also offer images. Such sites would almost certainly have infringed  
6 Perfect 10 copyrights, because they typically offer millions of pirated images.

7 5. Perfect 10 propounded discovery requests to Google in 2005 that were  
8 similar to requests 135-137 now before the court, except involving 137 models.  
9 When Google objected on the basis of burden, and Judge Hillman deferred his  
10 ruling, Perfect 10 reduced the requests to 9 models, and propounded requests 135  
11 and 137.

12 I declare under penalty of perjury under the laws of the United States of  
13 America that the foregoing is true and correct to the best of my knowledge.

14 Executed on April 4, 2008, at Los Angeles, California.

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17 Norman Zada, Ph.D.  
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