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21 UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
22 OAKLAND DIVISION

23 ORACLE USA, INC., *et al.*,  
24 Plaintiffs,  
25 v.  
26 SAP AG, *et al.*,  
27 Defendants.

Case No. 07-CV-01658 PJH (EDL)

**DECLARATION OF LISA J. CHIN IN  
SUPPORT OF OPPOSITION TO  
DEFENDANTS' MOTION TO EXCLUDE  
EXPERT TESTIMONY OF PROFESSOR  
DOUGLAS G. LICHTMAN**

Date: September 30, 2010  
Time: 2:30 p.m.  
Place: Courtroom 3  
Judge: Hon. Phyllis J. Hamilton

Case No. 07-CV-01658 PJH (EDL)

1 I, Lisa J. Chin declare as follows:

2 1. I am an attorney licensed to practice law in the State of California and before this  
3 Court, and am an associate at Bingham McCutchen LLP, counsel of record for plaintiffs Oracle  
4 USA, Inc. (predecessor to Oracle America, Inc.), Oracle International Corporation and Siebel  
5 Systems, Inc. (collectively, "Oracle") in this action. I have personal knowledge of the facts  
6 stated below and could testify competently to them if required.

7 2. All highlighting in these exhibits has been provided by Oracle to further assist in  
8 identifying the information relevant to Oracle's Opposition to Defendants' Motion to Exclude  
9 Testimony of Professor Douglas G. Lichtman.

10 3. Attached as Exhibit A is a true and correct copy of a SAP press release dated  
11 August 5, 2010 and taken from <http://www.tnlawsuit.com>.

12 4. Attached as Exhibit B is a true and correct copy of relevant excerpts from the  
13 Supplemental Expert Report of Paul K. Meyer, served by Oracle on February 23, 2010. Non-  
14 relevant portions of the Report have either been excluded or redacted.

15 5. Attached as Exhibit C is a true and correct copy of relevant excerpts from the  
16 Supplemental Expert Report of Stephen K. Clarke, served by Defendants on May 7, 2010. Non-  
17 relevant portions of the Report have either been excluded or redacted.

18 6. Attached as Exhibit D is a true and correct copy of relevant excerpts from the  
19 transcript of the April 20, 2010 Deposition of Douglas G. Lichtman. Non-relevant portions of  
20 the deposition transcript have either been excluded or redacted.

21 I declare under penalty of perjury under the laws of the United States and the  
22 State of California that the foregoing is true and correct, and that this Declaration was executed  
23 on September 9, 2010 in San Francisco, California.

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Lisa J. Chin