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 15 **UNITED STATES DISTRICT COURT**
 16 **NORTHERN DISTRICT OF CALIFORNIA**

17
 18 In Re Sony PS3 "Other OS" Litigation

Case No. CV-10-1811-RS

19
 20 **DECLARATION OF JAMES A. QUADRA IN**
SUPPORT OF PLAINTIFF'S OPPOSITION
 21 **TO DEFENDANT'S MOTION TO COMPEL**
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DECLARATION OF JAMES A. QUADRA ISO PLAINTIFFS' OPPOSITION TO DEFENDANT'S MTC

1 I, James A. Quadra, declare as follows:

2 1. I am a partner with the law firm Calvo Fisher & Jacob, LLP (formerly “Calvo &
3 Clark, LLP”), Interim Co-Lead Counsel representing the Plaintiffs in the above-captioned action.
4 I am a member of good standing of the State Bar of California. I have personal knowledge of the
5 facts stated herein, and if called on to do so, could and would testify competently thereto. I make
6 this declaration in support of Plaintiffs’ Opposition to Defendant’s Motion to Compel.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of Plaintiffs’ Amended
8 Initial Disclosures, which was served on December 10, 2010.

9 3. Attached hereto as **Exhibit 2** are true and correct copies of photographs of
10 Plaintiffs’ PS3s and peripheral devices produced on December 1, 2010, December 6, 2010, and
11 January 11, 2011.

12 4. Attached hereto as **Exhibit 3** are true and correct copies of photographs showing
13 the serial number on Mr. Herz’s PS3 (Herz 0000005) and on Mr. Huber’s PS3 (Huber 0000012)
14 produced on December 1, 2010.

15 5. Attached hereto as **Exhibit 4** are true and correct copies of additional photos of
16 Mr. Herz’s PS3 (Herz 0000227-228) produced on January 11, 2011.

17 6. Attached hereto as **Exhibit 5** are true and correct copies of photographs of Mr.
18 Ventura’s PS3, including the serial number (Ventura 0000040-41) and Mr. Stovell’s PS3,
19 including the serial number (Stovell 0000189, 192, 196) produced on December 6, 2010.

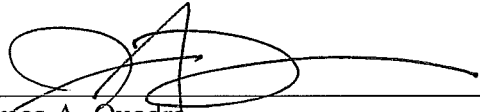
20 7. Attached hereto as **Exhibit 6** are true and correct copies of photographs of Mr.
21 Baker’s PS3, including the serial number (Baker 0000159-161) on January 11, 2011.

22 8. Attached hereto as **Exhibit 7** is a true and correct copy of Plaintiffs’ production
23 bates-labeled PLTF 0000001-0000025 produced on January 11, 2011.

24 9. Attached hereto as **Exhibit 8** are true and correct copies of Plaintiffs’ resumes
25 produced on December 1, 2010, December 6, 2010, and January 11, 2011.

26 I declare under penalty of perjury under the laws of the United States of America that the
27 foregoing facts are true and correct.

Executed this 14th day of January in San Francisco, California.


James A. Quadra

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