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10 *Attorneys for Plaintiff Federal Trade Commission*

11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**
 13 **SAN FRANCISCO DIVISION**

14 FEDERAL TRADE COMMISSION,)
 15)
 Plaintiff,)
 16)
 v.)
 17)
 D-LINK CORPORATION)
 18)
 and)
 19)
 D-LINK SYSTEMS, INC.,)
 20 corporations,)
 21)
 Defendants.)
 22)
 23

Case No. 3:17-cv-00039

**DECLARATION OF CATHLIN TULLY
 IN SUPPORT OF FEDERAL TRADE
 COMMISSION’S ADMINISTRATIVE
 MOTION TO FILE UNDER SEAL
 PORTIONS OF PLAINTIFF’S
 COMPLAINT**

24 1. I am an attorney for the plaintiff Federal Trade Commission (“FTC”) in this matter. I submit
 25 this declaration in support of the FTC’s Administrative Motion to File Under Seal Portions of
 26 Plaintiff’s Complaint, filed concurrently with this declaration. Unless stated otherwise, I
 27

1 make this declaration based on my own personal knowledge, and if called as a witness, I
2 could and would testify competently as follows.

3 2. The FTC's complaint alleges facts in Paragraphs 10, 11, and 25 that the FTC obtained during
4 the course of its non-public investigation of D-Link Systems, Inc. ("DLS"). In providing this
5 information to the FTC, DLS designated this information as confidential pursuant to Section
6 21 of the FTC Act, 15 U.S.C. § 57b-2.

7 3. I declare under penalty of perjury that the foregoing statements are true and correct.
8 Executed in Washington, DC, on January 5, 2017.

9
10 /s/ Cathlin Tully_____

11 CATHLIN TULLY