

1 Basil P. Fthenakis, Esq. (88399)  
 2 CRITERION LAW  
 3 2225 E. Bayshore Road, Suite 200  
 4 Palo Alto, California 94303  
 5 Tel. (650) 352-8400  
 6 Fax. (650) 352-8408  
 7 bpf@criterionlaw.com

8 Of counsel:

9 David S. Godkin (Admitted *pro hac vice*)  
 10 James E. Kruzer (Admitted *pro hac vice*)  
 11 BIRNBAUM & GODKIN, LLP  
 12 280 Summer Street  
 13 Boston, MA 02210  
 14 Tel: (617) 307-6100  
 15 Fax: (617) 307-6101  
 16 godkin@birnbaumgodkin.com  
 17 kruzer@birnbaumgodkin.com

18 Attorneys for Plaintiff,  
 19 SIX4THREE, LLC, a Delaware  
 20 limited liability company

21 UNITED STATES DISTRICT COURT  
 22 NORTHERN DISTRICT OF CALIFORNIA

23 SIX4THREE, LLC, a Delaware limited liability company,	)	Case No. 3:17-cv-00359-WHA
24 Plaintiff,	)	DECLARATION OF DAVID S.
25 v.	)	GODKIN IN SUPPORT OF
26 FACEBOOK, INC., a Delaware corporation, and DOES 1 through 50, inclusive	)	PLAINTIFF'S REPLY TO
27 Defendants.	)	DEFENDANT'S OPPOSITION TO
	)	PLAINTIFF'S MOTION TO REMAND
	)	_____
	)	Date: February 16, 2017
	)	Time: 8:00AM
	)	Ctrm: 8
	)	Judge: Honorable William H. Alsup

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I, David Godkin, declare:

1. I am a partner at the law firm of Birnbaum & Godkin LLP and counsel for Six4Three, LLC (“643”) in the above-captioned action.

2. I submit this Declaration in satisfaction of Civil L.R. 7-2 and 7-5.

3. A true and correct copy of the operative complaint filed by plaintiff in *National Credit Reporting Ass’n v. Experian Info. Solutions, Inc.*, U.S. Dist. LEXIS 17303 (N.D. Cal. July 21, 2004) is attached as Exhibit 1.

4. A true and correct copy of the operative complaint filed by plaintiff in *In re Nat’l Football Leagues Sunday Ticket Antitrust Litig.*, 2016 U.S. Dist. LEXIS 41639 (C.D. Cal. Mar. 28, 2016) is attached as Exhibit 2.

5. A true and correct copy of the letter I sent to Facebook’s Counsel on January 10, 2017 summarizing Six4Three’s review of discovery to date and summarizing the basis for its Motion to Compel production of documents in the custody of key Facebook executives is attached as Exhibit 3. This document contains selections and characterizations of documents which Facebook designated “Confidential” pursuant to Section 2 of the Protective Order entered into in the state court case by Judge Jonathan Karesh of the San Mateo Superior Court on October 25, 2016.

6. A true and correct copy of Bates Stamp FB-00061365 is attached as Exhibit 4. This document has been designated by Facebook as “Confidential” pursuant to the Protective Order in the state-court action.

1           7.     A true and correct copy of Bates Stamp FB-00423235 is attached as Exhibit 5.  
2 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
3 Order in the state-court action.

4           8.     A true and correct copy of Bates Stamp FB-00061249 is attached as Exhibit 6.  
5 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
6 Order in the state-court action.

7           9.     A true and correct copy of Bates Stamp FB-00061437 is attached as Exhibit 7.  
8 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
9 Order in the state-court action.  
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11          10.    A true and correct copy of Bates Stamp FB-00427400 is attached as Exhibit 8.  
12 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
13 Order in the state-court action.

14          11.    A true and correct copy of Bates Stamp FB-00427604 is attached as Exhibit 9.  
15 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
16 Order in the state-court action.  
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18          12.    A true and correct copy of Bates Stamp FB-00031050 is attached as Exhibit 10.  
19 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
20 Order in the state-court action.

21          13.    A true and correct copy of Bates Stamp FB-00043884 is attached as Exhibit 11.  
22 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
23 Order in the state-court action.  
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1           14.     A true and correct copy of Bates Stamp FB-00042856 is attached as Exhibit 12.  
2 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
3 Order in the state-court action.

4           15.     A true and correct copy of Bates Stamp FB-00042899 is attached as Exhibit 13.  
5 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
6 Order in the state-court action.

7           16.     A true and correct copy of Bates Stamp FB-00042373 is attached as Exhibit 14.  
8 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
9 Order in the state-court action.  
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11           17.     A true and correct copy of Bates Stamp FB-00043830 is attached as Exhibit 15.  
12 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
13 Order in the state-court action.

14           18.     A true and correct copy of Bates Stamp FB-00045735 is attached as Exhibit 16.  
15 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
16 Order in the state-court action.  
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18           19.     A true and correct copy of Bates Stamp FB-00047134 is attached as Exhibit 17.  
19 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
20 Order in the state-court action.

21           20.     A true and correct copy of Bates Stamp FB-00047035 is attached as Exhibit 18.  
22 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
23 Order in the state-court action.  
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21. A true and correct copy of Bates Stamp FB-00044220 is attached as Exhibit 19.  
This document has been designated by Facebook as “Confidential” pursuant to the Protective  
Order in the state-court action.

I declare the foregoing to be true and correct as of the date listed immediately below.

DATED: February 9, 2017

By: /s/David S. Godkin  
David S. Godkin  
Attorney for Six4Three, LLC

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies, under penalty of perjury under the laws of the State of  
California, that I electronically filed the foregoing document with the Clerk of the Court using  
the CM/ECF system which will send notification of such filing to the following:

Sonal N. Mehta  
Laura E. Miller  
Catherine Y. Kim  
Durie Tangri LLP  
217 Leidesdorff Street  
San Francisco, CA 94111  
SMehta@durietangri.com  
LMiller@durietangri.com  
CKim@durietangri.com

DATED: February 9, 2017

By: /s/David S. Godkin  
David S. Godkin