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12 Attorneys for Defendant and Counterclaimant
NETLIST, INC.

13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 OAKLAND DIVISION

17
18 GOOGLE, INC.,

19 Plaintiff,
Doc. 173

20 vs.

21 NETLIST, INC.,

22 Defendant.

CASE NO. C-08-04144 SBA

[Related to CASE NO. C-09-05718 SBA]

**DECLARATION OF STEVEN R. HANSEN
IN SUPPORT OF NETLIST, INC.'S
MOTION FOR SUMMARY JUDGMENT
OF PATENT INFRINGEMENT**

Date: July 27, 2010

Time: 1:00 p.m.

Place: Courtroom 3

Judge: Hon. Sandra Brown Armstrong

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25 AND RELATED COUNTERCLAIMS.
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1 I, Steven R. Hansen, declare:

2 1. I am an attorney admitted to practice in the states of California and
3 Michigan and before this Court. I am of counsel to Lee Tran & Liang APLC,
4 counsel of record for Defendant Netlist, Inc. (“Netlist”). I have personal knowledge
5 of the facts set forth herein and, if called as a witness, could and would testify
6 competently thereto under oath.

7 2. The parties met and conferred before the filing of the Motion for
8 Summary Judgment of Patent Infringement as required by the Court’s standing
9 order.

10 3. Attached hereto as Exhibit A is a true and correct copy of United
11 States Patent No. 7,289,386 (the “386 Patent”), entitled “Memory Module
12 Decoder.”

13 4. Attached hereto as Exhibit B is a true and correct copy of Amended
14 Exhibit A to Joint Claim Construction and Prehearing Statement, Docket No. 72-1
15 dated October 28, 2009.

16 5. Attached hereto as Exhibit C are true and correct copies of articles
17 about Google’s servers.

18 6. Filed concurrently under seal as Exhibit D is a true and correct copy of
19 excerpts from the deposition transcript of Robert Sprinkle taken February 18, 2010
20 (“Sprinkle Dep.”).

21 7. Filed concurrently under seal as Exhibit E is a true and correct copy of
22 excerpts from the deposition transcript of Richard Roy taken October 29, 2009
23 (“Roy Dep.”).

24 8. Filed concurrently under seal as Exhibit F is a true and correct copy of
25 excerpts from the deposition transcript of Andrew Dorsey taken March 11, 2010
26 (“Dorsey Dep.”).

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1 9. Filed concurrently under seal as Exhibit G is a true and correct copy of
2 a document produced by Google showing the number of 4-Rank FBDIMMS in
3 Google's Ilium servers, which was marked as Defendant's deposition exhibit 89
4 ("Def. Ex. 89").

5 10. Attached hereto as Exhibit H is a true and correct copy of Plaintiff
6 Google Inc.'s First Supplemental Responses to Netlist's Request for Admissions
7 Set No. One [Nos. 1-26] dated March 30, 2010 ("Pl.'s First Suppl. Resp. to Def.'s
8 Req. for Admis.").

9 11. Filed concurrently under seal as Exhibit I is a true and correct copy of
10 a block diagram of Google's 4-Rank FBDIMM, which was marked as Defendant's
11 deposition exhibit 9 ("Block Diagram I").

12 12. Filed concurrently under seal as Exhibit J is a true and correct copy of
13 a block diagram of Google's 4-Rank FBDIMM attached to an email sent by Google
14 employee Robert Sprinkle, which was marked as Defendant's deposition exhibit 73
15 ("Block Diagram II").

16 13. Filed concurrently under seal as Exhibit K is a true and correct copy of
17 excerpts of a document produced by Google showing the components used in its 4-
18 Rank FBDIMMs, which was marked as Defendant's deposition exhibit 90 ("Def.
19 Ex. 90").

20 14. Filed concurrently under seal as Exhibit L is a true and correct copy of
21 excerpts from the deposition transcript of William Hoffman taken May 18, 2010
22 ("Hoffman Dep.").

23 15. Filed concurrently under seal as Exhibit M is a true and correct copy of
24 a photograph taken during Defendant's inspection of a Google server showing a
25 portion of a 4-Rank FBDIMM found in the server. The photograph was marked as
26 Defendant's deposition exhibit 5 ("Def. Ex. 5").
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1 16. Filed concurrently under seal as Exhibit N is a true and correct copy of
2 a photograph taken during Defendant's inspection of Google's server showing a
3 portion of a 4-Rank FBDIMM found in the server. The photograph was marked as
4 Defendant's deposition exhibit 7 ("Def. Ex. 7").

5 17. Filed concurrently under seal as Exhibit O is a true and correct copy of
6 excerpts from the deposition transcript of Roland Knaack taken March 23, 2010
7 ("Knaack Dep.").

8 18. Filed concurrently under seal as Exhibit P is a true and correct copy of
9 excerpts from the deposition transcript of Sang Shim taken March 24, 2010 ("Shim
10 Dep.").

11 19. Attached hereto as Exhibit Q is a true and correct copy of excerpts of
12 JEDEC Standard JESD 206 entitled "FBDIMM: Architecture and Protocol, which
13 was marked as Defendant's deposition exhibit 10 ("JESD 206").

14 20. Filed concurrently under seal as Exhibit R is a true and correct copy of
15 excerpts of JEDEC Standard JESD 206 entitled "FBDIMM: Architecture and
16 Protocol attached to an email sent by Google employee Robert Sprinkle, which
17 was marked as Defendant's deposition exhibit 75 ("JESD 206").

18 21. Filed concurrently under seal as Exhibit S is a true and correct copy of
19 excerpts of an IDT User Manual for its Advanced Memory Buffer, which was
20 marked as Defendant's deposition exhibit 114 ("IDT User Manual").

21 22. Filed concurrently under seal as Exhibit T is a true and correct copy of
22 excerpts of a NEC User Manual for its Advanced Memory Buffer, which was
23 marked as Defendant's deposition exhibit 118 ("NEC User Manual").

24 23. Attached hereto as Exhibit U is a true and correct copy of Plaintiff
25 Google Inc.'s Responses to Netlist's Interrogatories, Set No. Two [Nos. 6-9] dated
26 October 27, 2009 ("Pl.'s Resp. to Def.'s Interrogs.").
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