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9 Attorneys for Defendants
 10 APPLE INC. and
 11 QUATTRO WIRELESS, INC.

12 **UNITED STATES DISTRICT COURT**
 13 **SOUTHERN DISTRICT OF CALIFORNIA**

14 STREETSPLACE, INC., a Delaware Corporation,

15 Plaintiff,

16 v.

17 GOOGLE INC., a Delaware Corporation,
 18 ADMOB, INC., a Delaware Corporation,
 19 APPLE INC., a California Corporation,
 20 QUATTRO WIRELESS, INC., a Delaware Corporation,
 21 NOKIA CORPORATION, a foreign corporation,
 22 NOKIA INC., a Delaware Corporation,
 23 NAVTEQ CORPORATION, a Delaware Corporation,
 24 MILLENIAL MEDIA, INC., a Delaware Corporation,
 25 JUMPTAP, INC., a Delaware Corporation,
 26 and DOES 1 through 20, inclusive,

27 Defendants.

Case No. 10-CV-1757 (LAB)

DECLARATION OF ANNE E. HUFFSMITH IN SUPPORT OF MOTION TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF CALIFORNIA

Judge: Hon. Larry A. Burns
 Hearing Date: March 14, 2011
 Time: 11:15 AM
 Courtroom: 9, 2nd Floor

Action Filed: August 23, 2010

1 I, Anne E. Huffsmith, declare:

2 1. I am a member of the Bar of the State of California and an associate with the law
3 firm O'Melveny & Myers LLP, attorneys for Apple Inc. and Quattro Wireless, Inc. in the above-
4 captioned litigation. I have personal knowledge of the facts set forth in this declaration and, if
5 called to testify as a witness, could and would do so under oath.

6 2. Attached hereto as Exhibit A are true and correct copies of pages from the website
7 www.prokerala.com/travel/flight-time/ showing flight times from Kaula Lumpur International
8 Airport to San Diego International Airport and Kaula Lumpur International Airport to San
9 Francisco International Airport.

10 3. Attached hereto as Exhibit B is a true and correct copy of an archived page of
11 Streetspace's website, describing the implementation of the "Street Linc" terminal system in
12 Berkeley, California. The website is available at
13 <http://web.archive.org/web/20000511125303/www.streetspace.com/intro.htm>. The website states
14 that "over 60 Street Lincs have already been deployed in retail spaces throughout downtown
15 Berkeley, CA," including Amoeba Records and the Bear's Lair.

16 4. Attached hereto as Exhibit C is a true and correct copy of an August 4, 2000 PR
17 Newswire article, titled "STREETSPACE to Offer Free Web Access Via Private Network in
18 Retail Locations," regarding the implementation of the "Street Linc" terminal system in Berkeley,
19 California. The article is available from Highbeam Research (www.highbeam.com). The article
20 states that "the company introduced a new version of its offering in over 40 high-traffic retail
21 locations in Berkeley," including Amoeba Music, Royal Ground Café, and Smart Alec's
22 restaurant.

23 I declare under penalty of perjury under the laws of the United States of America that the
24 foregoing is true and correct. Executed on the 20th day of January, 2011, at San Francisco,
25 California.

26 By: _____

27 Anne E. Huffsmith
28

**DECLARATION OF ANNE E. HUFFSMITH
IN SUPPORT OF MOTION TO TRANSFER VENUE
TO THE NORTHERN DISTRICT OF CALIFORNIA**

TABLE OF CONTENTS TO EXHIBITS

Exhibit	Page Numbers
A	4 - 8
B	9 - 11
C	12 - 14

**DECLARATION OF ANNE E. HUFFSMITH
IN SUPPORT OF MOTION TO TRANSFER VENUE TO
THE NORTHERN DISTRICT OF CALIFORNIA**

EXHIBIT A

Kuala Lumpur to San Diego Flight Time Calculator - Air Travel Time between Kuala Lumpur & San Diego

Home » Travel » Flight Time » From Kuala Lumpur Airport » To San Diego Airport

Calculate the Air [Travel Time](#) or the [Flight Time](#) from Kuala Lumpur to San Diego. Find out the total hours of [air travel](#) needed to reach Kuala Lumpur from San Diego. [Flying](#) time on an [airplane](#) from San Diego Airport to Kuala Lumpur Airport.

Travel Tools

- [Airports Home](#)
- [Airports in India](#)
- [Airports in US](#)
- [London Heathrow](#)
- [Airports in Canada](#)
- [Airports in Australia](#)
- [Los Angeles Airport, US](#)
- [Airport Distance](#)
- [Flight Time Calculator](#)
- [Distance Calculator](#)
- [World Time](#)
- [Timezones](#)
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- [Indian Railway](#)

India Maps

- [India Roads & Highways](#)
- [India River Map](#)
- [Ganges River Map](#)
- [India Airport Map](#)
- [Railway Map of India](#)
- [Blank Outline of India](#)
- [India Tourist Map](#)
- [Distance to India](#)

AIR TRAVEL TIME CALCULATOR - FLIGHT TIME BETWEEN KUALA LUMPUR AIRPORT & SAN DIEGO AIRPORT

[FLIGHT TIME CALCULATOR](#)

[AIRPORT IATA CODES](#)

[AIRPORT ICAO CODES](#)

[AIRPORTS & COUNTRIES](#)

1 retweet Like 3

Given below is the Air Travel Time or the Flight duration between Kuala Lumpur and San Diego. This flight time calculator is helpful in finding the air travel time between any two cities in the world, in this case travel time from Kuala Lumpur to San Diego. Flight time is calculated as the flying time from the nearest airports to the selected cities. The nearest airport to Kuala Lumpur, Malaysia, is [Kuala Lumpur International Airport](#) and the nearest airport to San Diego, United States, is [San Diego International Airport](#). The airport location map is also given below showing the air travel direction. To find air travel distance between more cities, use the form given below the map.

As per the inputs provided, the flight time or the hours of air travel required for a journey between Kuala Lumpur International Airport and San Diego International Airport is 16 hours 3 minutes

Flight Time between San Diego International Airport and Kuala Lumpur International Airport is :

16 hours 3 minutes

Departure Time : Wed, 19 Jan, 2011, 04:07 AM

Arrival Time : Wed, 19 Jan, 2011, 04:10 AM

If you haven't provided any addition information, the departure time is taken as the current time at Kuala Lumpur International Airport and the arrival time is the time at San Diego International Airport at the time of your arrival there.

KUL to SAN - Route Map



Find flight time from [Kuala Lumpur International Airport](#) or Kuala Lumpur or any other airport or city in Malaysia to various other destinations around the world using this [flight time calculator](#).

From	<input type="text" value="Kuala Lumpur International Airport, Malaysia"/>
To	<input type="text" value="San Diego International Airport, United States"/>
+ Show Additional Inputs	
<input type="button" value="Submit"/>	

Links to Other Sections

A list of major Cities/Airports around the world is given below. Click on any of the airport names given below to find the flight distance from Kuala Lumpur to those airports.

- » [Dubai, Dubai Airport](#)
- » [Toronto, Lester B. Pearson International Airport](#)
- » [Cancun, Cancun International Airport](#)
- » [Birmingham, Birmingham International Airport](#)
- » [Copenhagen, Kastrup Airport](#)
- » [Melbourne, Tullamarine Airport](#)
- » [Tokyo, Tokyo Haneda International Airport](#)
- » [Brasilia, Distrito Federal, Presidente Juscelino Kubitschek Airport](#)
- » [Edinburgh, Turnhouse Airport](#)
- » [Oakland, Oakland International Airport](#)

Finding flight time between cities is important while planning a [trip](#). This will help you schedule your trip perfectly. Kuala Lumpur to San Diego air travel distance is given above. This information will give you an idea about the hours of flight needed to reach San Diego, United States from Kuala Lumpur, Malaysia.

Using this air travel time calculator you can find the flying hours between Kuala Lumpur International Airport and San Diego International Airport on a direct flight as well as on an indirect flight with intermediate stopovers.

[India News](#) | [Kerala News](#) | [Bollywood Movies](#) | [Daily Horoscope](#) | [Kerala Pictures](#) | [India Pin Codes](#) | [ISD Codes](#) | [India STD Codes](#) | [Kerala Recipes](#) | [Online Games](#) | [Videos](#) | [Greeting Cards](#) | [Chinese New Year Dates](#) | [Vastu Shastra](#) | [Feng Shui](#) | [Chinese Birth Chart](#) | [Baby Names](#)

Kuala Lumpur to San Francisco, CA Flight Time Calculator - Air Travel Time between Kuala Lumpur & San Francisco, CA

Home » Travel » Flight Time » From Kuala Lumpur Airport » To San Francisco, CA Airport

Calculate the Air [Travel](#) Time or the **Flight Time** from **Kuala Lumpur to San Francisco, CA**. Find out the total hours of [air travel](#) needed to reach Kuala Lumpur from San Francisco, CA. [Flying](#) time on an [airplane](#) from San Francisco, CA Airport to Kuala Lumpur Airport.

Travel Tools

- [Airports Home](#)
- [Airports in India](#)
- [Airports in US](#)
- [London Heathrow](#)
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- [India Airport Map](#)
- [Railway Map of India](#)
- [Blank Outline of India](#)
- [India Tourist Map](#)
- [Distance to India](#)

AIR TRAVEL TIME CALCULATOR - FLIGHT TIME BETWEEN KUALA LUMPUR AIRPORT & SAN FRANCISCO, CA AIRPORT

[FLIGHT TIME CALCULATOR](#)

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[AIRPORTS & COUNTRIES](#)

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Given below is the Air Travel Time or the Flight duration between Kuala Lumpur and San Francisco, CA. This flight time calculator is helpful in finding the air travel time between any two cities in the world, in this case travel time from Kuala Lumpur to San Francisco, CA. Flight time is calculated as the flying time from the nearest airports to the selected cities. The nearest airport to Kuala Lumpur, Malaysia, is [Kuala Lumpur International Airport](#) and the nearest airport to San Francisco, CA, United States, is [San Francisco International Airport](#). The airport location map is also given below showing the air travel direction. To find air travel distance between more cities, use the form given below the map.

As per the inputs provided, the flight time or the hours of air travel required for a journey between Kuala Lumpur International Airport and San Francisco International Airport is 15 hours 16 minutes

Flight Time between San Francisco International Airport and Kuala Lumpur International Airport is :

15 hours **16** minutes

Departure Time : Wed, 19 Jan, 2011, 04:08 AM

Arrival Time : Wed, 19 Jan, 2011, 03:24 AM

If you haven't provided any addition information, the departure time is taken as the current time at Kuala Lumpur International Airport and the arrival time is the time at San Francisco International Airport at the time of your arrival there.

KUL to SFO - Route Map



Find flight time from **Kuala Lumpur International Airport** or Kuala Lumpur or any other airport or city in Malaysia to various other destinations around the world using this [flight time calculator](#).

From

To

[+ Show Additional Inputs](#)

Links to Other Sections

Submit

A list of major Cities/Airports around the world is given below. Click on any of the airport names given below to find the flight distance from Kuala Lumpur to those airports.

- » [Singapore, Changi Airport](#)
- » [Dallas, TX, Dallas/Fort Worth International Airport](#)
- » [Brisbane, Brisbane International Airport](#)
- » [Curitiba, Afonso Pena International Airport](#)
- » [Brasilia, Distrito Federal, Presidente Juscelino Kubitschek Airport](#)
- » [Auckland, Auckland International Airport](#)
- » [Miami, Miami International Airport](#)
- » [Abuja, Nnamdi Azikiwe International Airport](#)
- » [Luton, London Luton Airport](#)
- » [Guernsey, Guernsey Airport](#)

Finding flight time between cities is important while planning a [trip](#). This will help you schedule your trip perfectly. Kuala Lumpur to San Francisco, CA air travel distance is given above. This information will give you an idea about the hours of flight needed to reach San Francisco, CA, United States from Kuala Lumpur, Malaysia. Using this air travel time calculator you can find the flying hours between Kuala Lumpur International Airport and San Francisco International Airport on a direct flight as well as on an indirect flight with intermediate stopovers.

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**DECLARATION OF ANNE E. HUFFSMITH
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EXHIBIT B



PARTNERS



CONTACT US

RETAILER SOLUTIONS



E-TAILER SOLUTIONS



> STREET LINK

The Clicks-and-Mortar Network™

>STREETSPACE. offers the first truly connected network of Web-based kiosks for retail locations.

Our breakthrough solution fulfills each of the following unmet needs:

- ▣ Retailers need to build a strong online presence
- ▣ Consumer Product Manufacturers and Distributors need to increase effectiveness of in-store merchandising
- ▣ E-tailers need to build brand awareness and reach new customers
- ▣ Content Portals need to obtain more eyeballs and increase repeat traffic
- ▣ ISPs need to acquire new users
- ▣ Consumers need free and continuous online access

>STREETSPACE. FEATURES

In order to encourage fast adoption and ubiquity, >STREETSPACE. is 100% free to the user. The user stays within our "walled garden of content" at all times.

- ▣ Partner-Specific Content (i.e. TowerRecords.com or Coca-cola.com)
- ▣ Online Shopping (books, CDs, tickets, groceries, etc.)
- ▣ E-Mail (including 3rd-party email providers: Yahoo!, AOL, HotMail)
- ▣ Classifieds (rooms, cars, local events, etc.)
- ▣ Music (music samples, CD search, videos, reviews, articles)
- ▣ Film (movie trailers, film clips, reviews, articles)
- ▣ News (up-to-the-minute headlines and stories)
- ▣ Sports (all the latest scores, stats, and highlights)

- ▣ Local City Guide (local listings, directions, maps)
- ▣ Personal Calendar
- ▣ Personal Phonebook

STREET LINC: THE CLICKS-AND-MORTAR KIOSK™

Working with IDEO Design, the world's leading product design firm, we have developed a unique Web-based kiosk called the Street Linc for deployment in retail spaces all over the country. The Street Linc's curvy, 21st century design is sleek, inviting, and fits easily into a wide range of retail environments.

Made of cast aluminum, the Street Linc includes a touchscreen (no mouse necessary), a full keyboard (spill-proof), stereo speakers, stereo headphones, and a drink tray. The Street Linc is



connected to our network with a digital subscriber line (DSL), allowing for a rich, compelling online experience. A smart card reader is built into the system to facilitate transactions and loyalty program tie-ins in the future.

THE BERKELEY VALIDATION NETWORK

In order to validate our network before expanding the >STREETSPACE. network nationwide, over 60 Street Lincs have already been deployed in retail spaces throughout downtown Berkeley, CA. They have been up and running since last October, and they are in use today by nearly 20,000 registered users. The Street Lincs have been placed in high-traffic locations all over town, including Tower Records, Reel Video (owned by Hollywood Video and an extension of Reel.com), Amoeba Music, Fine Arts Cinema, Cody's Books, and Bear's Lair (on UC Berkeley's campus). >STREETSPACE. has literally achieved ubiquity in Berkeley. Of course, Berkeley is only the beginning. We are now ready to expand our network nationwide.

**DECLARATION OF ANNE E. HUFFSMITH
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THE NORTHERN DISTRICT OF CALIFORNIA**

EXHIBIT C



>STREETSPACE to Offer Free Web Access Via Private Network in Retail Locations.

Article from: **PR Newswire** Article date: **August 4, 2000**

SAN FRANCISCO, Aug. 4 /PRNewswire/ --

>STREETSPACE, the first company to offer consumers free access to Web-based content in retail locations over a private network, is poised to expand to major markets, starting with San Francisco. For the last 9 months, consumers in Berkeley, CA have been accessing >STREETSPACE's free Web-based services in cafe's, book stores, record stores, and restaurants via stylishly designed Web Stations(TM).

Four weeks ago, the company introduced a new version of its offering in over 40 high-traffic retail locations in Berkeley, including Tower Records, Amoeba Music, Cody's Books, Reel Video, Royal Ground Cafe, and Smart Alec's restaurant. >STREETSPACE users now have free access to major websites like HotMail, CitySearch, FOXSports.com, and ABC News.com, plus content that focuses on U.C. Berkeley. With minimal marketing in Berkeley, >STREETSPACE has already enticed over 30,000 people to register there, which represents close to one third of the city's total population. Now, >STREETSPACE is looking to roll out its network in larger cities by partnering with national retail chains.

With the built-in limitations of PDAs and mobile phones today -- low bandwidth, cost of hardware, service charges, tiny screen, and lack of a usable keyboard -- the idea of placing Web-based kiosks in public places has caught fire in the marketplace. According to a report released by Forrester Research in June, 80% of retailers are planning to have Web-based kiosks in most of their stores by 2002.

"We're creating a new category here," says founder Tom Mathai. "With the millions of people accessing the Internet every day, we decided to address consumers' desire for online access when they don't happen to be at home or work. The need for access doesn't just go away because you walk out the door. So, we are building a network in the retail space to fill that need."

>STREETSPACE's strategy is to help retailers leverage their brick and mortar space to build presence for their online offerings. The company offers retailers a free end-to-end solution that includes installation of the Web Stations and the high-speed Internet connection, network management, customer service, maintenance, cleaning, and usage reporting. The retailer's online offering is displayed prominently on the Web Station screen, and retailers retain 100% of any sales generated from their sites.

In San Francisco, the launching pad for >STREETSPACE's private network will be the new home of the San Francisco Giants, Pacific Bell Park. Starting tonight, fans attending home games will have free access to Giants-specific content and other popular websites. Additionally, >STREETSPACE will soon be announcing pilot programs with some of the most recognized brick and mortar retail chains.

"The fact that we take care of everything for our retail partners makes our Clicks-and-Mortar Network solution very attractive. Building a private broadband network in retail locations is technically and operationally complex. By working with us, the retailers don't have to lift a finger, nor do they have to pay," says Vice President of Marketing at >STREETSPACE, Michael Wranovics. "Additionally, we give them a percentage of the revenue generated by Web Stations in their locations."

The company will earn revenue by offering sponsorships to dot-com companies who will have the opportunity to build their brands, acquire new users, and retain them by making their sites prominent and accessible in retail locations. "We could make Schwab.com the exclusive online trader accessible in 40 high-traffic retail locations for less than the cost of a standard billboard," says Wranovics. "The key differentiator is that people can actually experience the Schwab site, become registered users, and conduct trades on a Web Station. All a billboard can do is remind you that the company exists."

About >STREETSPACE

On October 22, 1999, >STREETSPACE launched the first Clicks-and-Mortar Network(TM) with over 60 high-traffic retail locations in Berkeley, CA. >STREETSPACE, which is now poised to expand its private broadband network nationally, is helping retail businesses leverage their physical space to build a stronger online presence and provide their customers with free online access. The >STREETSPACE offering consists of compact, stylishly designed Web Stations connected to a private broadband network. Standard features on a Web Station include the retail partner's online offering, plus free access to e-mail, a city guide, news, sports, online shopping, and other popular online offerings.

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