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12 Attorneys for Plaintiff
13 STREETSPACE, INC.

14
15 IN THE UNITED STATES DISTRICT COURT
16
17 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

18 STREETSPACE, INC., a Delaware
19 corporation,

20 Plaintiff,

21 vs.

22 GOOGLE INC., a Delaware corporation;
23 ADMOB, INC., a Delaware corporation;
24 APPLE INC., a California corporation;
25 QUATTRO WIRELESS, INC., a Delaware
26 corporation; NOKIA CORPORATION, a
27 foreign corporation; NOKIA INC., a
28 Delaware corporation; NAVTEQ
CORPORATION, a Delaware corporation;
MILLENNIAL MEDIA, INC., a Delaware
corporation; JUMPTAP, INC., a Delaware
corporation; and DOES 1 through 20,
inclusive,

Defendants.

CASE NO. 10-CV-1747-LAB-AJB

**DECLARATION OF TREVOR Q.
CODDINGTON IN SUPPORT OF THE
MOTION BY PLAINTIFF
STREETSPACE, INC. TO
DISQUALIFY COUNSEL FOR
DEFENDANT MILLENNIAL MEDIA**

Date: March 14, 2011
Time: 11:15 a.m.
Judge: Hon. Larry A. Burns
Ctrm.: 9

1 I, Trevor Q. Coddington, declare as follows:

2 1. I am an attorney licensed to practice in California and this District and am a
3 Partner with the law firm San Diego IP Law Group LLP, counsel of record for Plaintiff
4 Streetspace, Inc. ("Streetspace") in the above-captioned matter.

5 2. I joined the law firm of Hunton & Williams ("Hunton") in Washington, DC as a
6 Patent Agent in December of 2002. I resigned from Hunton on February 9, 2005, to join the law
7 firm of Paul, Hastings, Janofsky & Walker in San Diego, CA as an Associate. During my tenure
8 at Hunton, Hunton employed more than 850 attorneys working in 17 offices in the United States,
9 Europe, and Asia.

10 3. My duties at Hunton included preparing and prosecuting patent applications before
11 the United States Patent & Trademark Office ("PTO") under the direction and guidance of
12 various partners at Hunton. I became an Associate at Hunton in 2004.

13 4. Streetspace became a client of Hunton sometime in December of 2002 or January
14 of 2003 while I was a Patent Agent there. Various Hunton attorneys and staff assisted Streetspace
15 in its intellectual property and corporate matters. Streetspace disengaged Hunton in March of
16 2005 and transferred its Hunton matters over to me at Paul, Hastings, Janofsky & Walker shortly
17 thereafter.

18 5. During the time Streetspace was a client of Hunton, Christopher C. Campbell was
19 a Partner at Hunton in its Washington, DC office. Particularly, Mr. Campbell was a Partner in
20 Hunton's Intellectual Property group and his practice focused on "all aspects of patent law" as
21 quoted from his Hunton profile.

22 6. Mr. Campbell represents Defendant Millennial Media, Inc. in the above-captioned
23 matter. Mr. Campbell's application to appear *pro hac vice* was approved by this Court on January
24 24, 2011.

25 7. Attached hereto as Exhibit A is a true and correct copy of Mr. Campbell's profile
26 available from www.hunton.com on November 30, 2002, which was archived and is available at
27 the Internet Archive – Wayback Machine at web.archive.org.

28 8. Attached hereto as Exhibit B is a true and correct copy of Mr. Campbell's profile

1 available from www.hunton.com on December 29, 2004, which was archived and is available at
2 the Internet Archive – Wayback Machine at web.archive.org.

3 9. During my tenure at Hunton, I assisted Streetspace in the prosecution of United
4 States Patent Application No. 09/959,654 (“the ‘654 application”), which eventually became U.S.
5 Patent No. 6,847,969 (“the ‘969 patent”). The ‘969 patent is asserted in the above-captioned
6 matter.

7 10. During my tenure at Hunton, I participated in meetings with intellectual property
8 partners to discuss the status of various intellectual property matters, such as the status and
9 prosecution of patent applications, office actions, and related issues.

10 11. Hunton began prosecuting the ‘654 application sometime in early 2003. For
11 example, on February 4, 2003, I recorded an Assignment of the ‘654 application with the PTO.

12 12. On May 2, 2003, I submitted a Change of Correspondence Address in the ‘654
13 application to the PTO. Attached hereto as Exhibit C is a true and correct copy of the Change of
14 Correspondence Address taken from the PTO file history of the ‘654 application. The Change of
15 Correspondence Address formally acknowledges that Hunton is prosecuting the ‘654 application
16 on behalf of Streetspace from thereon and that all further PTO correspondence should be directed
17 to Customer Number 21967, which is the Customer Number for Hunton.

18 13. On January 25, 2005, the ‘654 application was issued as the ‘969 patent. Attached
19 hereto as Exhibit D is a true and correct copy of the issued ‘969 patent. The issued ‘969 patent
20 lists “Hunton & Williams LLP” as the “Attorney, Agent, or Firm.” On January 25, 2005, Mr.
21 Campbell was a Partner at Hunton.

22 14. As a patent attorney registered to practice before the PTO during his tenure at
23 Hunton, Mr. Campbell would have been associated with Hunton’s Customer Number. By being
24 associated with Hunton’s Customer Number, Mr. Campbell could have been able to act on behalf
25 of any Hunton client having a matter pending before the PTO including Streetspace.

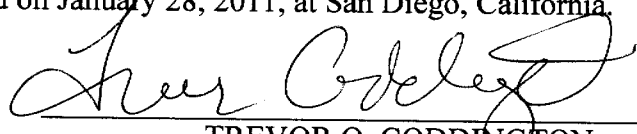
26 15. Hunton employed a centralized document management system in which attorneys
27 and staff throughout its United States offices had computer access to all electronic documents
28 stored in the centralized document management. It was common practice for all Hunton attorneys

1 and staff to save electronic documents (e.g., bills, legal memorandum, opinions, notes, factual
2 analysis, formal pleadings, email) in Hunton's centralized document management system.
3 Streetspace documents were kept in Hunton's centralized document management system and
4 included confidential information, attorney-work product, and/or attorney-client privileged
5 communications. It was also common practice for attorneys in the Washington, DC office of
6 Hunton to meet regularly to discuss intellectual property clients (such as Streetspace) and their
7 respective financial wherewithal, and to discuss legal issues affecting those clients' interests.

8 16. Mr. Campbell had access to Streetspace documents kept in Hunton's centralized
9 document management system.

10 17. Although I was not privy to Hunton partnership meetings, it is my general
11 understanding that client matters and the financial wherewithal of Hunton clients were discussed
12 (either formally or informally) at those partnership meetings. As a Partner, Mr. Campbell would
13 have attended those partnership meetings.

14 18. I declare under penalty of perjury under the laws of the United States that the
15 foregoing is true and correct. Executed on January 28, 2011, at San Diego, California.

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18 TREVOR Q. CODDINGTON
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