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17 Attorneys for Defendants
 18 MILLENNIAL MEDIA, INC.

19 UNITED STATES DISTRICT COURT
 20 SOUTHERN DISTRICT OF CALIFORNIA

21 STREETSPLACE, INC.,

22 Plaintiff,

23 v.

24 GOOGLE INC.; ADMOB, INC.;
 25 MILLENNIAL MEDIA INC.; QUATTRO
 26 WIRELESS, INC.; NOKIA
 27 CORPORATION; NOKIA INC.; NAVTEQ
 28 CORPORATION; MILLENNIAL MEDIA,
 INC.; JUMPTAP, INC.; and DOES 1 through
 20,

Defendants.

Case No. 3:10-CV-01757-LAB-AJB

**DECLARATION OF CHRISTOPHER C.
 CAMPBELL OPPOSING STREETSPLACE'S
 MOTION TO DISQUALIFY**

Judge: Hon. Larry Alan Burns
 Hearing Date: March 14, 2010
 Time: 11:15 AM
 Courtroom: 9, 2nd Floor

Action Filed: August 23, 2010

1 I, CHRISTOPHER C. CAMPBELL, declare:

2 1. I am counsel to Millennial Media in the case Streetspace v. Google et al., Case No.
3 3:10-CV-01757-LAB-AJB. I am a member of the bars of Virginia and Washington, D.C. I
4 provide this declaration in support of Millennial Media's Opposition to Streetspace's motion to
5 disqualify me personally and my firm Cooley LLP as counsel in this matter.
6

7 2. By way of background, I was a partner of Hunton & Williams from 2000-2007, a
8 partner of Goodwin Procter from 2007-2009. Since 2009, I have been a partner with Cooley
9 LLP.

10 3. In April 2000 I was promoted to the partnership of Hunton & Williams. During
11 my entire tenure with Hunton & Williams, the intellectual property team was based in the
12 Washington, D.C. office. In the summer of 2000, I transferred from the Washington, D.C. office
13 to the McLean, VA office of Hunton & Williams. The McLean, VA office of Hunton was a
14 satellite office not only of the firm, but also of the intellectual property team. In order to field
15 calls from clients using the same telephone number following my transfer from the Washington,
16 D.C. office of Hunton & Williams to its satellite McLean, VA office, I continued to use my D.C.
17 office line. Any calls to my D.C. telephone line following my transfer were automatically
18 forwarded to my office in McLean, Virginia. I remained a resident of the McLean, VA satellite
19 office of Hunton & Williams until I withdrew from the partnership in 2007.
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21 4. I did not hold any firm-wide management functions at Hunton & Williams,
22 including in my capacity as a partner on the intellectual property team. I also did not hold any
23 management functions for Hunton & Williams' McLean, VA office or its Washington, DC office.
24 My management responsibilities at Hunton & Williams were limited to the cases that I handled.
25

26 5. I understand that Mr. Coddington contends in his declaration that, during his entire
27 tenure with Hunton & Williams, I was "in" the Washington, D.C. office of Hunton & Williams. I
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1 further understand that Mr. Coddington points to two web biographies of mine obtained from
2 www.archive.org to support his contention that he and I were “in” the same office, namely the
3 Washington, D.C. office of Hunton & Williams. To the contrary, and as Mr. Coddington must
4 know, I maintained only a telephone number in the Washington, D.C. office during Mr.
5 Coddington’s entire tenure with Hunton & Williams. In fact, the patent team of Hunton &
6 Williams’s Washington, D.C. office during Mr. Coddington’s tenure were situated on a single
7 floor, so Mr. Coddington must have known that I did not maintain an office in Washington, D.C.,
8 but rather only a telephone number. I observe that Mr. Coddington has not, nor can he, testify
9 that we ever met in my so-called office “in” Washington, D.C. Put simply, I did not have an
10 office “in” Washington, D.C. with Hunton & Williams during Mr. Coddington’s tenure, but
11 rather I maintained only a telephone number, which was forwarded to my McLean, VA office.
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14 6. Since the summer of 2000 through my withdrawal from Hunton & Williams in
15 2007, I was not aware of any regular meetings at the Washington, DC office of Hunton &
16 Williams that were open to all attorneys at the office, during which the attorneys discussed
17 particular intellectual property clients and the legal issues affecting those clients’ interests.
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19 7. With the exception of my very limited involvement in due diligence in connection
20 with patent infringement litigation involving entirely unrelated technology (hearing aids), I never
21 collaborated with Mr. Coddington on any matter at Hunton & Williams. In fact, I recall meeting
22 Mr. Coddington in person on just one occasion – and that was when Mr. Coddington happened to
23 be visiting the McLean, VA office of Hunton & Williams. I may have had one or two other
24 chance meetings with Mr. Coddington. Mr. Coddington and I did not discuss Streetspace at any
25 time. Nor did I ever have any discussions, strategy or otherwise pertaining to Streetspace with
26 any other lawyers or personnel at Hunton & Williams. Mr. Coddington did not report to me at
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1 Hunton & Williams. I never reviewed Mr. Coddington's performance as an associate of Hunton
2 & Williams. I never critiqued Mr. Coddington's work at Hunton & Williams.

3 8. When I was at Hunton & Williams, I never billed a single minute to Streetspace. I
4 never accessed any of Streetspace's files, electronic, hard copies or otherwise. I never attended
5 any meetings where Streetspace or Streetspace matters were discussed at Hunton & Williams.
6 Nor did I ever learn after the fact that Streetspace or Streetspace matters were discussed at any
7 Hunton & Williams meetings I did not attend. And, I was not involved in any way in the
8 formulation of policy or strategy for Streetspace.
9

10 9. I am attaching hereto as Exhibit 1, a true and correct copy of email correspondence
11 between Mr. Coddington and myself dated January 3, 2011 and January 4, 2011, respectively. In
12 our email exchange, I informed Mr. Coddington that I had never heard of Streetspace prior to this
13 suit and never had any conversations with anyone regarding Streetspace prior to this suit. I
14 informed Mr. Coddington as follows:
15

16 I had never heard of StreetSpace either while at Hunton & Williams or
17 thereafter. The very first time I heard of StreetSpace was when I was engaged by
18 Millennial Media to defend Millennial Media against a suit involving a patent you
19 prosecuted while you were an employee of Hunton & Williams. Rest assured, the
20 only way I know that you prosecuted the patent in suit is by the public records at
21 the PTO and your representations to me during our calls involving this lawsuit
22 against Millennial Media. Any "confidential" information I have regarding
23 StreetSpace came from you after the suit was filed. So to the extent you contend I
24 am in possession of "confidential" information of StreetSpace, that so-called
25 "confidential" information came exclusively from you and thus you have waived
26 the attorney client privilege.

27 Please feel free to confirm for yourself that I was not involved in any way with
28 StreetSpace. You are presumably in possession of all of StreetSpace's files
involving the patent in suit, including the bills sent to them pertaining to your
work. Feel free to review the bills. You will not find my name anywhere.

Finally, as I'm sure you are aware, at any given time, Hunton is prosecuting
hundreds (if not thousands) of patent applications. I would have had no reason
whatsoever to access any of StreetSpace's files, and never did so. Nor did I have
any discussions with Rodger Tate about StreetSpace – as I said at the outset, the
very first time I heard of StreetSpace was after StreetSpace filed this lawsuit.

1 10. The foregoing statements in my email to Mr. Coddington are truthful and accurate.
2 I had never heard of Streetspace either while at Hunton & Williams or thereafter. The very first
3 time I heard of Streetspace was when I was engaged by Millennial Media to defend Millennial
4 Media against a suit involving a patent Mr. Coddington apparently prosecuted while he was
5 employee of Hunton & Williams. The only way I know that Mr. Coddington prosecuted the
6 patent in suit is by the public records at the U.S. Patent and Trademark Office and Mr.
7 Coddington's representations to me during our calls involving this lawsuit against Millennial
8 Media. Any "confidential" information I have regarding Streetspace came exclusively from Mr.
9 Coddington after the suit was filed. I would have had no reason whatsoever to access any of
10 Streetspace's files. Indeed, I never accessed Streetspace's files at Hunton & Williams. Nor did I
11 have any discussions with Rodger Tate, a Hunton & Williams partner, about Streetspace's
12 confidential information. After Streetspace filed this motion to disqualify me, I spoke with Brian
13 Buroker, the head of Hunton & Williams's intellectual property practice, and Rodger Tate, whom
14 Mr. Coddington followed to Hunton & Williams from the Brobeck law firm, and confirmed the
15 fact that I have never discussed Streetspace with them prior to this suit, including my entire tenure
16 with Hunton & Williams. The very first time I heard of StreetSpace was after StreetSpace filed
17 this lawsuit.
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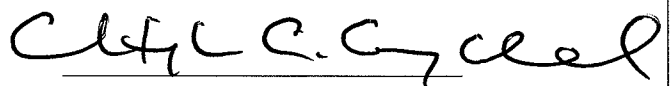
20 11. When I withdrew from Hunton & Williams in 2007, I did not take any files with
21 me. The only files, electronic or otherwise that moved with me upon my withdrawal from
22 Hunton & Williams were those where the clients had instructed Hunton & Williams to transfer
23 their files to me. Streetspace was not one of those clients – i.e., Streetspace did not transfer its
24 files to me when I withdrew from Hunton & Williams. Instead, as I understand it based upon Mr.
25 Coddington's declaration, Streetspace elected to move its files to the Paul Hastings firm when
26 Mr. Coddington joined the Paul Hastings firm from Hunton & Williams in 2005.
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12. During Mr. Coddington's entire tenure with Hunton & Williams, there were two other patent attorney partners in the McLean, VA satellite office of Hunton & Williams – Kevin Duncan and Patrick Doody. I understand that Messrs. Duncan and Doody have provided the Court with declarations in support of Millennial Media's Opposition to Streetspace's Motion to Disqualify Counsel for Millennial Media.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: February 28, 2011



By: CHRISTOPHER C. CAMPBELL

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