

EXH. 1

Campbell, Christopher

From: Campbell, Christopher
Sent: Tuesday, January 04, 2011 12:04 PM
To: 'Trevor Coddington, Ph.D.'
Cc: jamesfazio@sandiegoiplaw.com; dougolson@sandiegoiplaw.com
Subject: RE: STREETSPACE, INC. V. GOOGLE, INC., ET AL.

Trevor,

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

Please feel free to confirm for yourself that I was not involved in any way with 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.

Sincerely yours,
Chris

Christopher C. Campbell
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From: Trevor Coddington, Ph.D. [mailto:trevorcoddington@sandiegoiplaw.com]
Sent: Monday, January 03, 2011 5:20 PM
To: Campbell, Christopher
Cc: jamesfazio@sandiegoiplaw.com; dougolson@sandiegoiplaw.com
Subject: RE: STREETSPACE, INC. V. GOOGLE, INC., ET AL.

Chris,

We appreciate your representations regarding the timing of when Millennial first became aware of Streetspace and Streetspace's patent – discovery, of course, will confirm such. However, at this stage of the litigation, we are more concerned with your involvement with Streetspace, if any, while you were an attorney at Hunton & Williams ("Hunton"). Streetspace was a Hunton client from 2002-2005 and sought Hunton's legal advice on various intellectual property and corporate matters. In fact, the asserted Streetspace patent was allowed and issued during the time when Streetspace was a Hunton client.

It is my understanding that you were a Partner at Hunton during some, if not all, of that 2002-2005 time frame. I believe it is safe to say that every Hunton attorney throughout all of Hunton's offices had access to Streetspace information, some of which was confidential, that was kept in the centralized Hunton document management system. I know I had access to such when I visited the McLean office of Hunton on various occasions during my tenure at Hunton.

Hence, we must ask:

- 1) When did your tenure at Hunton start and end?
- 2) When did you first become aware of Streetspace?
- 3) Were you involved in any Streetspace matter at Hunton? If so, what was the scope of your involvement?
- 4) Did you ever access any of Streetspace's confidential information, e.g., information that was kept in the Hunton document management system?
- 5) Did you participate in any discussions with other Hunton attorneys regarding Streetspace or the Streetspace patent?
- 6) Did you participate in any Hunton attorney meetings, e.g., partnership meetings, discussing Streetspace as a Hunton client?
- 7) Did you have any discussions with Rodger Tate or any other attorneys in Hunton's DC or McLean office regarding Streetspace?

At your earliest convenience, please clarify your involvement, if any, with Streetspace during your time at Hunton and whether such can be verified by other attorneys at Hunton during that time, e.g., Rodger Tate.

Regards,

Trevor Q. Coddington, Ph.D., Esq.
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From: Campbell, Christopher [mailto:ccampbell@cooley.com]
Sent: Thursday, December 23, 2010 7:58 AM
To: 'trevorcoddington@sandiegoiplaw.com'
Cc: 'jamesfazio@sandiegoiplaw.com'; 'dougolson@sandiegoiplaw.com'
Subject: Re: STREETSSPACE, INC. V. GOOGLE, INC., ET AL.

Trevor,;

Convenience is not the only reason for seeking an extension. It has to do with the fact that StreetSpace and Millennial Media were engaged in settlement discussions up until service of the complaint. During the time that StreetSpace sat on the complaint without serving it, Millennial Media was far more interested in resolving the matter than ramping up to develop defenses and otherwise preparing to respond to the complaint.;

We were hopeful – and remain so – that the case will resolve on reasonable terms. Only at the point where it became evident that the case won't resolve (i.e., it became evident on Dec. 8, the belated date that StreetSpace finally decided to break off settlement discussions and proceed with service) did it become necessary to begin developing defenses in earnest and otherwise preparing to respond to the complaint. During the nearly 120 days between the filing of the complaint and service – a period during which any prudent client and firm are more interested in resolving a

matter than engaging in legal spend – my client remained hopeful that the case would resolve.;

As I'm sure you are well aware, my client had no advanced notice of this suit. They have never heard of StreetSpace. They have never heard of the patent in suit. It is only now that settlement discussions are apparently over that we must begin assessing the merits of a patent we only recently learned about. However, with the holidays upon us, we are into the New Year for all intents and purposes.;

I appreciate your offer for an extension until Monday, January 17th. I remain disappointed that you can't accommodate my request for an extension through January 31st – I have doubts about your representations that other sophisticated co-defendants are somehow less prepared to answer than my client. In any event, Monday, January 17th is a federal holiday which is observed by my firm. Please let me know if you are willing to accommodate an extension through Tuesday, January 18th. If so, we can dispense with the need to meet and confer today and I will instead proceed to prepare a draft of the extension papers through Jan. 18th.;

Sincerely yours,
Chris

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From: Trevor Coddington, Ph.D.
To: Campbell, Christopher
Cc: 'James V. Fazio, III' ; dougolson@sandiegoplaw.com
Sent: Wed Dec 22 18:55:18 2010
Subject: RE: STREETSPLACE, INC. V. GOOGLE, INC., ET AL.
Chris,

You haven't indicated why you need additional time other than it is inconvenient for you. Streetspace wants to move this case forward and get a decision on the merits as soon as reasonably possible.

Nonetheless, we are sensitive to the deadline occurring over the holidays. Accordingly, Streetspace is willing to grant Millennial an extension up to Monday, **January 17, 2011** – no more. That will give your firm nearly 3 weeks additional time to draft an Answer and any motions you are considering.

Regards,

Trevor

From: Campbell, Christopher [mailto:ccampbell@cooley.com]
Sent: Wednesday, December 22, 2010 2:41 PM
To: Trevor Coddington, Ph.D.
Cc: 'James V. Fazio, III'; dougolson@sandiegoplaw.com
Subject: RE: STREETSPLACE, INC. V. GOOGLE, INC., ET AL.

Trevor,

I think it is unfortunate that you are taking this position and I'm fairly confident it will not be well received by the Court. As you are well aware, your client waited nearly 120 days to serve the complaint – apparently strategically doing so in a

manner that would cause Millennial Media's Answer to be due the week between Christmas and New Years. In view of the holidays, your four day extension is tantamount to no extension at all.

I ask that you reconsider your position by close of business today. If you won't agree to an extension of time until Jan. 31, please let me know whether you are available to talk tomorrow at 10:30 PST / 1:30 EST as I would like to have a formal meet and confer in advance of a motion I will make to the Court (hopefully that we can avoid).

Sincerely yours,
Chris

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From: Trevor Coddington, Ph.D. [mailto:trevorcoddington@sandiegoiplaw.com]
Sent: Wednesday, December 22, 2010 5:26 PM
To: Campbell, Christopher
Cc: 'James V. Fazio, III'; dougolson@sandiegoiplaw.com
Subject: RE: STREETSPACE, INC. V. GOOGLE, INC., ET AL.

Chris,

Streetspace is willing to grant Millennial an extension of 4 days. Google was a different set of circumstances as they have only recently engaged counsel and had good cause for an extension. Millennial, on the other hand, has engaged your firm for at least three months to address the complaint and accordingly, has had ample time to develop its defenses or otherwise respond to the complaint.

Regards,

Trevor

From: Campbell, Christopher [mailto:ccampbell@cooley.com]
Sent: Wednesday, December 22, 2010 2:04 PM
To: James V. Fazio, III
Cc: 'Trevor Coddington'
Subject: STREETSPACE, INC. V. GOOGLE, INC., ET AL.

Trevor and James,

I'm following up on my v/m to Trevor of earlier today about an extension of time for Millennial Media to move, answer or otherwise respond to the complaint. I saw that Google received an extension through January 31st. Millennial requests a similar extension. Please let me know if you will agree to an extension through January 31 for Millennial Media to move, answer or otherwise respond. With the approaching holiday, I would appreciate the courtesy of your response to this request.

In anticipation that StreetSpace will assent to this extension, I will proceed to draft up the documents for your approval.

Sincerely yours,
Chris

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