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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 NELSON KUAN IN  
 SUPPORT OF MILLENNIAL MEDIA'S  
 OPPOSITION TO 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

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I, NELSON KUAN, declare:

1. I am counsel to Millennial Media in the case *Streetspace v. Google et al.*, Case No. 10-cv-1757-LAB-AJB. I am a member of the Virginia bar. I provide this declaration in support of Millennial Media’s Opposition to Streetspace’s motion to disqualify Mr. Campbell and Cooley LLP as counsel in this matter.

2. Cooley LLP has never represented Streetspace based on an internal conflicts search using “Streetspace” or “Street space.” The only hit from the internal conflicts search involves Streetspace as the adverse party in the present matter where Cooley LLP is representing Millennial Media. A true and correct copy of an internal conflicts search using “Streetspace” or “Street space” is attached hereto as Exhibit A.

3. On March 6, 2002, Mr. Coddington signed and submitted to the Patent Office a Petition for Extension of Time for U.S. Patent Application 09/959,654 (the ‘654 application) from which U.S. Patent No. 6,847,969 was issued. The petition signed by Mr. Coddington shows the correspondence address of Brobeck, Phleger & Harrison’s (“Brobeck’s”) Washington D.C. office, and a true and correct copy is attached hereto as Exhibit B.

4. On March 21, 2002, Mr. Coddington signed and submitted to the Patent Office an Information Disclosure Statement for the ‘654 application. The statement signed by Mr. Coddington shows the correspondence address of Brobeck’s Washington D.C. office, and a true and correct copy is attached hereto as Exhibit C.

5. On February 4, 2003, Mr. Coddington recorded with the Patent Office a patent assignment for the ‘654 application. The assignment recorded by Mr. Coddington shows the correspondence address of Hunton & Williams’ (“Hunton’s”) Washington D.C. office, and a true and correct copy is attached hereto as Exhibit D.

1           6.       On May 2, 2003, Mr. Coddington signed and submitted to the Patent Office a  
2 Change of Correspondence Address for the '654 application. The change of correspondence  
3 address signed by Mr. Coddington shows the correspondence address of Hunton's Washington  
4 D.C. office, and a true and correct copy is attached hereto as Exhibit E.

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6           7.       On February 26, 2004, Mr. Coddington signed and submitted to the Patent Office a  
7 Request for a Three-Month Extension of Time, a Response to Non-Final Office Action, and a  
8 Transmittal Letter for the '654 application. True and correct copies of the Request for a Three-  
9 Month Extension of Time, the Response to Non-Final Office Action, and the Transmittal Letter  
10 are attached hereto as Exhibits F, G and H, respectively.

11           8.       On May 12, 2004, the Examiner at the Patent Office entered an Examiner  
12 Interview Summary Record for the '654 application listing the participants consisted only of Mr.  
13 Coddington and the Examiner. A true and correct copy of the Examiner Interview Summary  
14 Record is attached hereto as Exhibit I.

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16           9.       On June 29, 2004, Mr. Coddington signed and submitted to the Patent Office a  
17 Supplemental Information Disclosure Statement for the '654 application. A true and correct copy  
18 of the Supplemental Information Disclosure Statement is attached hereto as Exhibit J.

19           10.      On August 18, 2004, Mr. Coddington signed and submitted to the Patent Office an  
20 Amendment After Allowance Under 37 CFR § 1.312, an Issue Fee Payment Transmittal, a  
21 Request for Corrected Filing Receipt and Submission of Application Data Sheet, and a  
22 Resubmission of Supplemental Information Disclosure Statement for the '654 application. A true  
23 and correct copy of the Amendment After Allowance Under 37 CFR § 1.312, the Issue Fee  
24 Payment Transmittal, the Request for Corrected Filing Receipt and Submission of Application  
25 Data Sheet, and the Resubmission of Supplemental Information Disclosure Statement are  
26 attached hereto as Exhibit K, L, M, and N, respectively.  
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11. On November 16, 2005, Mr. Coddington signed and submitted to the Patent Office a Request for Certificate of Correction of Office Mistake under 37 C.F.R. § 1.322. The petition signed by Mr. Coddington shows the correspondence address of Paul, Hastings, Janofsky & Walker's San Diego, CA office, and a true and correct copy is attached hereto as Exhibit O.

12. A true and correct copy of the Transaction History of the '654 application from the Patent Office PAIR system is annotated with the period during which Mr. Coddington was associated with Hunton, and with the submissions and interviews made by Mr Coddington on behalf of the '654 application. The annotated copy of the Transaction History of the '654 application is attached hereto as Exhibit P.

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: NELSON KUAN