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7 Attorneys for Plaintiff
STREETSPACE, INC.

8
9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

11 STREETSPACE, INC., a Delaware
12 corporation,

13 Plaintiff,

14 vs.

15 GOOGLE INC., a Delaware corporation;
ADMOB, INC., a Delaware corporation;
16 APPLE INC., a California corporation;
QUATTRO WIRELESS, INC., a Delaware
17 corporation; NOKIA CORPORATION, a
foreign corporation; NOKIA INC., a
18 Delaware corporation; NAVTEQ
CORPORATION, a Delaware corporation;
19 MILLENNIAL MEDIA, INC., a Delaware
corporation; JUMPTAP, INC., a Delaware
20 corporation; and DOES 1 through 20,
inclusive,

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

**REPLY DECLARATION OF TREVOR
Q. CODDINGTON IN SUPPORT OF
STREETSPACE'S MOTION 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. While I was an associate at Hunton & Williams ("Hunton"), I occasionally visited
6 Hunton's McLean, VA office to support intellectual property partners on various patent matters.
7 Hunton's McLean, VA office is a short distance drive (roughly 12 miles) from the Washington,
8 DC office.

9 3. On at least one such visit, I reported directly to Mr. Campbell to assist him on a
10 Hunton client matter. In particular, I prepared a memorandum for Mr. Campbell regarding
11 reverse-engineering law, which I believe was eventually sent to the respective Hunton client – the
12 memorandum names Mr. Campbell in the "from" field and the client in the "to" field. During the
13 preparation of that memorandum, Mr. Campbell reviewed and critiqued the content of my
14 memorandum. I have a copy of that memorandum and can submit such *in camera* to the Court if
15 it so desires.

16 4. I was an associate performing work for partners in the same practice group in
17 which Mr. Campbell was a partner. Mr. Campbell would have been considered my superior and
18 one of my supervisors at Hunton. Had I not left Hunton prior to an upcoming annual associate
19 performance evaluation, Mr. Campbell would have likely participated in (or at least commented
20 on) my performance at the firm since he was an intellectual property partner whom I had worked
21 for during the period of evaluation.

22 5. With respect to Hunton's intellectual property group, the McLean, VA and
23 Washington, DC offices were effectively one in the same – a firm within a firm. I agree with Mr.
24 Campbell's assessment that the McLean, VA office was considered a satellite office of the
25 Washington, DC office. Patent attorneys from each of those two offices shared library resources,
26 conference rooms, war rooms, paralegals, clerks, and foreign filing assistants, and participated in
27 patent law seminars, intellectual property group meetings, and firm-sponsored social events. In
28 fact, I recall that the intellectual property groups in both offices jointly held their Christmas party

1 together on at least occasion where I socialized and discussed various firm matters with Mr.
2 Campbell, Mr. Duncan, and/or Mr. Doody. It was regular practice at Hunton to discuss general
3 intellectual property and patent issues facing Hunton clients.

4 6. At the time I left Hunton, the Washington, DC office consisted of approximately
5 11 or 12 intellectual property partners (including Mr. Campbell) and 9 intellectual property
6 associates; the McLean, VA office consisted of approximately 4 intellectual property partners
7 (including Mr. Campbell) and 3 intellectual property associates. Approximately one-third of
8 those attorneys focused on technology matters relating to electronics and telecommunications.
9 Patent attorneys in both offices worked on many patent matters together, particularly patent
10 litigation and United States Patent & Trademark Office matters.

11 7. In my original declaration in support of the instant Motion to Disqualify, I
12 submitted two firm profiles (roughly two years apart) of Mr. Campbell, which were formerly
13 available at www.hunton.com and archived at web.archive.org. Those profiles indicate, among
14 other things, that Mr. Campbell was a Partner in both the Washington, DC office and the
15 McLean, VA office – interestingly, however the Washington, DC office is listed above the
16 McLean, VA office.

17 8. Mr. Campbell did not have a permanent physical office in Washington, DC.
18 However, I recall seeing Mr. Campbell in the Washington, DC office on numerous and regular
19 occasions as he worked on patent litigation and United States Patent & Trademark Office matters
20 primarily handled by attorneys in the Washington, DC office.

21 9. Mr. Campbell has listed his firm address as that of the Washington, DC office
22 (rather than Hunton's McLean, VA office) on court or United States Patent & Trademark Office
23 filings, which are available to any member of the public, during the period between 2003 and
24 2007. For example:

25 a. Attached hereto as Exhibit A are excerpts (cover page and signature page)
26 taken from a true and correct copy of an Appeal Brief submitted on December 19, 2006, to the
27 Board of Patent Appeals and Interferences of the United States Patent & Trademark Office in *Ex*
28 *Parte NTP, Inc.*, Reexamination Proceeding No. 90/006,677;

b. Attached hereto as Exhibit B are excerpts (cover page and signature page) taken from a true and correct copy of a Joint Status Report and Rule 26(f) Report submitted on November 22, 2006, in *Energy Transportation Group, Inc. v. Sonic Innovations, Inc.*, C.A. No. 05-422 (GMS), U.S. District Court for the District of Delaware; and

c. Attached hereto as Exhibit C are excerpts (cover page and signature page) taken from a true and correct copy of an Appeal Brief submitted on August 7, 2007, to the Board of Patent Appeals and Interferences of the United States Patent & Trademark Office in *In re NTP, Inc.*, Reexamination Proceeding Nos. 95/000,020 and 90/006,495.

10. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on March 7, 2011, at San Diego, California.

TREVOR Q. CODDINGTON