

1 Robert N. Phillips (SBN 120970)
Ethan B. Andelman (SBN 209101)
2 HOWREY LLP
525 Market Street, Suite 3600
3 San Francisco, CA 94105
Telephone: (415) 848-4900
4 Facsimile: (415) 848-4999

5 David A. Rammelt (Admitted *Pro Hac Vice*)
Susan J. Greenspon (Admitted *Pro Hac Vice*)
6 Dawn M. Beery (Admitted *Pro Hac Vice*)
KELLEY DRYE & WARREN LLP
7 333 West Wacker Drive, Suite 2600
Chicago, IL 60606
8 Telephone: (312) 857-7070
Facsimile: (312) 857-7095

9 Attorneys for Defendant/Counter-Plaintiff
10 AMERICAN BLIND AND WALLPAPER
FACTORY, INC.

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13 GOOGLE INC., a Delaware corporation,

14 Plaintiff,

15 v.

16 AMERICAN BLIND & WALLPAPER
FACTORY, INC., a Delaware corporation
17 d/b/a decoratetoday.com, Inc.; and DOES 1-
18 100, inclusive,

19 Defendants.

Case No. C 03-5340-JF (RS)

**DECLARATION OF CAROLINE C.
PLATER IN SUPPORT OF AMERICAN
BLIND AND WALLPAPER FACTORY
INC.'S MOTION TO COMPEL GOOGLE
TO RESPOND TO DISCOVERY TIMELY
SERVED GIVEN THE CURRENT
CUTOFF DATE OF AUGUST 26, 2006**

Date: TBD
Time: TBD
Courtroom: 4
Hon. Richard Seeborg

21 AMERICAN BLIND & WALLPAPER
FACTORY, INC., a Delaware corporation
22 d/b/a decoratetoday.com, Inc.,

23 Counter-Plaintiff,

24 v.

25 GOOGLE, INC.,

26 Counter-Defendants

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28

1 I, Caroline C. Plater declare as follows:

2 1. I am an attorney at Kelley Drye & Warren LLP, counsel of record for
3 Defendant/Counter-Plaintiff American Blind and Wallpaper Factory, Inc. (“American Blind”) in
4 the above-captioned action. I am a member in good standing of the State Bar of Illinois. I have
5 personal knowledge of the facts set forth in this declaration and, if called as a witness, could and
6 would testify competently to such facts under oath.

7 2. Attached hereto as Exhibit A is a true and correct copy of the Transcript of
8 Proceedings Before the Honorable Jeremy Fogel, dated June 23, 2006.

9 3. Attached hereto as Exhibit B is a true and correct copy of American Blind and
10 Wallpaper Factory Inc.’s First Set of Requests For Admission to Google Inc.

11 4. Attached hereto as Exhibit C is a true and correct copy of Notice of Deposition of
12 Larry Page.

13 5. Attached hereto as Exhibit D is a true and correct copy of Notice of Deposition of
14 Sergey Brin.

15 6. Attached hereto as Exhibit E is a true and correct copy of correspondence from
16 Klaus H. Hamm to Caroline C. Plater, dated June 26, 2006.

17 7. Attached hereto as Exhibit F is a true and correct copy of correspondence from
18 Klaus H. Hamm to Caroline C. Plater, dated June 28, 2006.

19 8. Attached hereto as Exhibit G is a true and correct copy of correspondence from
20 David A. Rammelt to Klaus H. Hamm, dated June 30, 2006.

21 9. Attached hereto as Exhibit H is a true and correct copy of e-mail correspondence
22 between David A. Rammelt and Michael Page, dated July 2, 2006.

23 10. Attached hereto as Exhibit I is a true and correct copy of correspondence from
24 Caroline C. Plater to Klaus H. Hamm, dated July 11, 2006.

25 11. Attached hereto as Exhibit J is a true and correct copy of e-mail correspondence
26 from Michael Page copying David A. Rammelt, dated July 11, 2006.

27 12. Attached hereto as Exhibit K is a true and correct copy of American Blind and
28 Wallpaper Factory Inc.’s Initial Disclosures Pursuant to Fed. R. Civ. P. 26.

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13. Attached hereto as Exhibit L is a true and correct copy of excerpts from the deposition of Alana Karen, taken in this case on April 12, 2006.

14. Attached hereto as Exhibit M is a true and correct copy of excerpts from the deposition of Prashant Fuloria, taken in this case on May 18, 2006.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13th day of July 2006, in Chicago, Illinois.

/s/ Caroline C. Plater
CAROLINE C. PLATER