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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-  
100, inclusive,

18 Defendants.

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

**DECLARATION OF CAROLINE C.  
PLATER IN SUPPORT OF AMERICAN  
BLIND AND WALLPAPER FACTORY,  
INC.'S OPPOSITION TO COUNTER-  
DEFENDANT GOOGLE INC.'S MOTION  
TO COMPEL COUNTER-PLAINTIFF  
ABWF TO SATISFY ITS OUTSTANDING  
DISCOVERY OBLIGATIONS**

Date: October 18, 2006  
Time: 9:30 a.m.  
Courtroom: 4  
Hon. Richard Seeborg

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

24 Counter-Plaintiff,

25 v.

26 GOOGLE, INC.

27 Counter-Defendants.  
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 correspondence  
8 from Caroline C. Plater to Ajay S. Krishnan, dated September 19, 2006.

9 3. Attached hereto as Exhibit B is a true and correct copy of correspondence  
10 from Ajay S. Krishnan to Caroline C. Plater, dated September 21, 2006.

11 4. Attached hereto as Exhibit C is a true and correct copy of Google Inc.’s  
12 Amended Notice of 30(b)(6) Deposition.

13 5. Attached hereto as Exhibit D are true and correct copies of pages from the  
14 deposition transcript of Gerald Curran, taken on August 3, 2006.

15 6. Attached hereto as Exhibit E is a true and correct copy of American Blind  
16 and Wallpaper Factory, Inc.’s Response to Plaintiff Google Inc.’s First Set of Requests For  
17 Admission.

18 7. Attached hereto as Exhibit F is a true and correct copy of correspondence  
19 from Caroline C. Plater to Ajay S. Krishnan, dated September 5, 2006.

20 8. Attached hereto as Exhibit G are true and correct copies of email  
21 correspondence between American Blind and The Kaden Company, dated September 13, 2006  
22 and September 8, 2006 (redacted portion of the September 8, 2006 email contains attorney-client  
23 privileged communications).

24 9. Attached hereto as Exhibit H are true and correct copies of correspondence  
25 from Caroline C. Plater accompanying the document productions from American Blind to Google  
26 since April 2006.

27 10. Attached hereto as Exhibit I are true and correct copies of correspondence  
28 from Klaus H. Hamm to David A. Rammelt, dated March 20, 2006, and March 23, 2006, and

1 from Klaus H. Hamm to Caroline C. Plater, dated March 28, 2006.

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

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Executed this 27<sup>th</sup> day of September 2006, in Chicago, Illinois.

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/s/ Caroline C. Plater  
CAROLINE C. PLATER

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