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 AMERICAN BLIND AND WALLPAPER
 11 FACTORY, INC.

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14 SAN JOSE DIVISION

15 GOOGLE INC., a Delaware corporation,

16 Plaintiff,

17 v.

18 AMERICAN BLIND & WALLPAPER
 FACTORY, INC., a Delaware corporation
 d/b/a decoratetoday.com, Inc.; and DOES 1-
 19 100, inclusive,

20 Defendants.

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

**RESPONSIVE DECLARATION OF
 CAROLINE C. PLATER REGARDING
 GOOGLE INC.'S MOTION FOR
 ADMINISTRATIVE RELIEF SEEKING
 AN ORDER SEALING DOCUMENTS
 FOR FILING IN RELATION TO
 GOOGLE'S RESPONSE TO ABWF'S
 FOUR DECLARATIONS REGARDING
 ABWF'S ALLEGED PRESERVATION,
 COLLECTION, AND PRODUCTION OF
 MATERIALS IN RESPONSE TO APRIL
 27, 2007 COURT ORDER**

Judge: Hon. Richard Seeborg

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

24 Counter-Plaintiff,

25 v.

26 GOOGLE, INC.,
 27 Counter-Defendant.

1 I, Caroline C. Plater, declare as follows:

2 1. I am an associate with the firm Kelley Drye & Warren LLP, counsel for
3 Defendant/Counter-Plaintiff, American Blind and Wallpaper Factory, Inc. (“American Blind”),
4 and I am admitted to practice before this Court *pro hac vice*.

5 2. I make this responsive declaration pursuant to Civil Local Rule 79-5(d) regarding
6 the Motion For Administrative Relief Seeking An Order Sealing Documents For Filing In
7 Relation To Google’s Response to ABWF’s Four Declarations Regarding ABWF’s Alleged
8 Preservation, Collection, and Production of Materials in Response to April 27, 2007 Court Order
9 (“Google’s Sealing Motion”). Unless otherwise stated, I know the facts stated herein of my
10 personal knowledge and if called as a witness, I would testify competently thereto.

11 3. Google’s Sealing Motion seeks an order sealing Exhibit A to the Declaration of
12 Ajay S. Krishnan.
13

14 4. Exhibit A to the Declaration of Ajay S. Krishnan contains documents that were
15 produced by American Blind in this litigation, bates range ABWF 047376-047377, and marked as
16 Attorneys Eyes Only. These pages contain American Blind’s confidential business information
17 and business plans regarding its internet advertising strategy. These matters are deemed
18 confidential and subject to the Confidential and Attorneys Eyes Only designations pursuant to the
19 terms of the Protective Order in place in this case.
20

21 I state under penalty of perjury of the laws of the United States of America that the
22 foregoing statements are true and correct and that this declaration was executed on June 1, 2007.
23

24 /s/ Caroline C. Plater
25 _____
26 CAROLINE C. PLATER
27