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6 Attorneys for Plaintiff and Counter Defendant
 GOOGLE INC. and Third-Party Defendants
 ASK JEEVES, INC. and EARTHLINK, INC.
 7

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
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11 GOOGLE INC., a Delaware corporation,
 12
 Plaintiff,
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14 v.

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

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

**DECLARATION OF KLAUS H. HAMM
 IN SUPPORT OF GOOGLE'S
 OPPOSITION TO ENFORCE
 STIPULATED PROTECTIVE ORDER
 AND TO DEDESIGNATE DOCUMENTS**

Date: January 27, 2006
 Time: TBA
 Dept: TBA
 Judge: TBA

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

20 Counter Plaintiff,
 21

v.

22 GOOGLE INC., AMERICA ONLINE, INC.,
 NETSCAPE COMMUNICATIONS
 23 CORPORATION, COMPUSERVE
 INTERACTIVE SERVICES, INC., ASK
 24 JEEVES, INC. and EARTHLINK, INC.,

25 Counter Defendant/
 26 Third-Party Defendants.
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1 I, Klaus H. Hamm, declare as follows:

2 1. I am associated with the firm of Kecker & Van Nest LLP, counsel for Plaintiff
3 Google Inc., and am admitted to practice before this Court. The facts set forth herein are known
4 to me of my personal knowledge, and if called upon I can testify truthfully thereto.

5 2. Attached hereto as Exhibit A is a true and correct copy of American Blind &
6 Wallpaper Factory, Inc.'s First Set of Requests for Production of Documents and Things From
7 Google, Inc.

8 3. Attached hereto as Exhibit B is a true and correct copy of Stipulated Protective
9 Order, entered on September 29, 2004 by the United States District Court for the Eastern District
10 of Virginia in the case *Government Employees Ins. Co. v. Google, Inc.*, No. 1:04cv 507
11 (LMB/TCB).

12 4. Attached hereto as Exhibit C is a true and correct copy of a letter dated December
13 5, 2005 from me to David A. Rammelt, counsel for American Blind & Wallpaper Factory, Inc.
14 ("American Blind").

15 5. Attached hereto as Exhibit D is a true and correct copy of a string of five emails
16 dated November 15, 2005 between myself and Susan J. Greenspon, counsel for American Blind.

17 6. Attached hereto as Exhibit E are true and correct copies of documents produced
18 by American Blind with Bates numbers ABWF 1850-1852.

19 7. Attached hereto as Exhibit F are true and correct copies of documents produced
20 by American Blind with Bates numbers ABWF 1859-1860.

21 8. Attached hereto as Exhibit G are true and correct copies of documents produced
22 by American Blind with Bates numbers ABWF 1953-1957.

23 9. Attached hereto as Exhibit H is a true and correct copy of a string of two emails
24 dated December 27, 2005 between myself and Mr. Rammelt.

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I state under penalty of perjury of the laws of the United States of American that the foregoing statements are true and correct and that this declaration was executed on January 3, 2006.


KLAUS H. HAMM