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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

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CLRB HANSON INDUSTRIES, LLC d/b/a
INDUSTRIAL PRINTING, and HOWARD
13 STERN, on behalf of themselves and all others
similarly situated,

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Plaintiffs,

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v.

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GOOGLE, INC.,

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Defendant.

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CASE NO. C O5-03649 JW

**DECLARATION OF M.
CHRISTOPHER JHANG IN
RESPONSE TO PLAINTIFFS'
OPPOSITION TO GOOGLE INC.'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL IN
CONNECTION WITH GOOGLE INC.'S
OPPOSITION TO PLAINTIFFS'
SUPPLEMENTAL MEMORANDUM
(DOCUMENT NOS. 154-155)**

Date: June 11, 2007
Time: 9:00 a.m.
Dept.: Courtroom 8
Judge: Honorable James Ware

1 I, M. Christopher Jhang, hereby declare as follows:

2 1. I am an attorney duly licensed to practice law in all of the courts of the State of
3 California and this Court, and am an attorney with the law firm of Perkins Coie LLP, counsel for
4 defendant Google Inc. (“Google”) in this action. Pursuant to Civil Local Rule 79-5(d), I submit
5 this declaration in response to the Declaration of Michele F. Raphael In Opposition To
6 Defendant Google Inc.’s Administrative Motion To File Under Seal In Connection With Google
7 Inc.’s Opposition To Plaintiffs’ Supplemental Memorandum In Support of Partial Summary
8 Judgment (“Plaintiffs’ Opposition to Seal Documents”), filed with this Court on May 24, 2007
9 (Document Nos. 154-155). I have personal knowledge of the facts set forth below except as to
10 those matters stated on information and belief, and as to those matters, I believe them to be true.
11 If called upon to testify, I could and would testify competently as to the matters set forth herein.

12 2. Google’s Opposition To Plaintiffs’ Supplemental Memorandum In Support of
13 Partial Summary Judgment (“Google’s Supplemental Opposition”) contains, discusses, or refers
14 to information or documents that Google considers to be confidential, proprietary, or trade secret
15 information. It discusses the operation of Google’s AdWords system and references deposition
16 testimony of Google’s software engineers regarding Google’s internal processes and information
17 not available to the public, including proprietary technology related to the AdWords program and
18 the development of new technology. It also discusses the content of Google’s internal training
19 materials.

20 3. The deposition transcripts, portions of which are attached as Exhibits A, B, and C
21 to the Supplemental Declaration of M. Christopher Jhang In Support of Google’s Supplemental
22 Opposition (“Supplemental Jhang Declaration”), are confidential, in whole or in part, as set forth
23 in the declaration supporting Google’s motion to seal. *See* Declaration of M. Christopher Jhang
24 In Support of Google Inc.’s Motion For Leave To File Documents Under Seal In Connection
25 With Google Inc.’s Opposition To Plaintiffs’ Supplemental Memorandum In Support of Partial
26 Summary Judgment, ¶¶ 5-7. Notably, these transcripts that are the subject of Plaintiffs’
27 complaints are the result of additional discovery ordered by the Court regarding “how the
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