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 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN JOSE DIVISION

11 KINDERSTART.COM LLC, a California
 12 limited liability company, on behalf of itself and
 all others similarly situated,

13 Plaintiffs,

14 v.

15 GOOGLE, INC., a Delaware corporation,

16 Defendant.

Case No. C 06-2057 JF

**DECLARATION OF GREGORY J. YU
 IN SUPPORT OF PLAINTIFF'S
 MOTION FOR SPECIFIED DISCOVERY
 ON DEFAMATION AND LIBEL**

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 18 I, GREGORY J. YU, HEREBY DECLARE AS FOLLOWS:

19 1. I am legal counsel to plaintiff KinderStart.com LLC ("KSC") in the above action
 20 and am authorized by my client to make this declaration in support of Plaintiff's motion for an
 21 order shortening time for motion for specified discovery by Plaintiff.

22 2. On June 6, 2006, I had a telephone conversation with counsel to Defendant,
 23 David H. Kramer, of Wilson, Sonsini, Goodrich & Rosati about Plaintiffs' need to conduct
 24 discovery on PageRank™ in connection with its defamation and libel count. Mr. Kramer
 25 indicated that if a request were submitted, it could be considered by Google the following week.
 26 In so responding, he indicated that Google would likely object to such discovery because of trade
 27 secret protection.

28 3. On June 13, 2006, I sent a letter to Mr. Kramer as an informal discovery request

