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 10 Attorneys for Defendant
 VEOH NETWORKS, INC.

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

14 IO GROUP, INC.

15 Plaintiff,

16 vs.

17 VEOH NETWORKS, INC.

18 Defendant.

Case No. C 06-3926 HRL

**DECLARATION OF MATTHEW SCHERB
 IN SUPPORT OF DEFENDANT VEOH
 NETWORKS, INC.'S OPPOSITION TO
 PLAINTIFF'S MOTION FOR ORDER
 ALLOWING PARTIES TO EXCEED
 OTHERWISE APPLICABLE PAGE
 LIMITATIONS; [PROPOSED] ORDER**

Winston & Strawn LLP
 101 California Street
 San Francisco, CA 94111-5894

1 I, Matthew Scherb, declare as follows based on personal knowledge:

2 1. I am attorney licensed to practice in the State of California and admitted to the bar of
3 this Court. I am an associate at Winston & Strawn, LLP, counsel to Defendant Veoh Networks, Inc.
4 in this action.

5 2. To date, Plaintiff and Defendants have produced, in total, less than 10,000 pages of
6 paper documents, exclusive of some electronic data, and have taken only six depositions.

7 3. Plaintiff assert only three substantive causes of action, all for alleged violations of
8 copyright law.

9 4. After this Court resolved a handful of discovery disputes involving Plaintiff's first set
10 of document requests, the parties have engaged in multiple rounds of additional discovery without
11 the need of further court intervention.

12 5. When Plaintiff asked Defendant's counsel to stipulate to double the allowed page
13 limits for summary judgment briefing, without any specific explanation as to why such extensive
14 briefing would be required, Defendant's counsel explained that if there were specific reasons
15 justifying such a request Defendant would consider them, but that otherwise Defendant could not
16 stipulate to Plaintiff's request.

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

18 Executed this 25th day of July, 2007 in San Francisco, California.

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20 _____
21 Matthew Scherb