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

13 COUPONS, INC.,) Case No. 5:07-cv-03457 HRL
14)
Plaintiff,) **DECLARATION OF HOLLIS BETH**
15) **HIRE**
v.)
16)
JOHN STOTTLEMIRE, and DOES 1-10,) Date: December 4, 2007
17) Time: 10:00 am
Defendants.) Courtroom: 2
18) Judge: Hon. Howard R. Lloyd

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20 I, Hollis Beth Hire, declare as follows:

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22 1. I am an attorney admitted to practice law before this Court, and am an associate
23 at the law firm of Wilson Sonsini Goodrich & Rosati, former counsel for Plaintiff Coupons,
24 Inc. ("Plaintiff"). I have personal knowledge of the facts set forth in this declaration.

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26 2. On October 18, 2007, I spoke with Defendant John Stottlemire ("Stottlemire")
27 by telephone. During this conversation, I confirmed that Coupons, Inc. was changing counsel
28 to Farella Braun + Martel LLP, and that attorneys from that firm would be handling the

1 representation of Coupons, Inc. going forward. Stottlemire asked if he would see me at the
2 hearing on the motion for sanctions, and I responded that I supposed he would.

3 3. Prior to filing the First Amended Complaint (“FAC”) in this case, I and other
4 attorneys at Wilson Sonsini Goodrich & Rosati (“WSGR”) reviewed relevant documents and
5 interviewed witnesses. Among these documents were the screenshots and emails attached as
6 exhibits to the Declaration of Ed (Bud) Miller, which include a screenshot of a posted message
7 by “virtually_john,” Stottlemire’s apparent screen name, on the Coupon Queen website forum
8 stating that “I recently posted information on another site (dealideal) on how to beat the
9 limitation imposed by the software provided by coupons.com and would allow users of that
10 software to print an unlimited number of coupons from the coupons.com website.” I and other
11 attorneys from WSGR also interviewed Jeffrey Weitzman of Plaintiff and Ed Miller several
12 times before filing the FAC.

13 4. My pre-filing investigation and that of other attorneys at WSGR revealed the
14 information contained in the declarations of Ed Miller and Jeffrey Weitzman, and the exhibits
15 attached thereto that predate the FAC.

16 5. In my and other WSGR attorneys’ interviews with Jeffrey Weitzman, who is in
17 the best position to know the details and the efficacy of Plaintiff’s print limiting technology, he
18 described the security features to us. I and other WSGR attorneys also installed Plaintiff’s
19 coupon printer software on our computers to become familiar with the process of accessing and
20 printing coupons, as well as the security features that limit such activities.

21 6. My experience with Plaintiff’s coupon printing software confirmed that the print
22 limitations it imposes are not easy to remove. Without assistance, I would not have known to
23 look for unique identifiers on my hard drive, and would not have been able to locate them to
24 remove them even if I knew that there were unique identifiers on my hard drive.

25 7. Attached as Exhibit 1 is a true and correct copy of an article titled “Coupon
26 Hacker Faces DMCA Lawsuit,” which appeared on August 20, 2007 on the Wired online
27 magazine. I printed this copy of the article from the www.wired.com website on November 12,
28 2007.

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I declare under penalty of perjury that the foregoing is true and correct. Executed at Palo Alto, California, on November 13, 2007.

By: /s/ Hollis Beth Hire
 Hollis Beth Hire