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Attorneys for Defendants

Akanoc Solutions, Inc.,

Managed Solutions Group, Inc.

and Steve Chen

**UNITED STATES DISTRICT COURT****NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

LOUIS VUITTON MALLETTIER, S.A.,

Case No.: C 07-3952 JW

Magistrate Judge Howard R. Lloyd

Plaintiff,

**DECLARATION OF STEVE CHEN****IN SUPPORT OF DEFENDANTS'**

vs.

**OPPOSITION TO VUITTON'S MOTION****FOR MODIFICATION OF ORDER AND****SANCTIONS**

AKANOC SOLUTIONS, INC., et al.,

Date: May 26, 2009

Time: 10:00 a.m.

Ctmm: 2, 5<sup>th</sup> Floor

Defendants.

1 I, STEVE CHEN, declare as follows:

2 I am the President and manager of Managed Solutions Group, Inc. ("MSG") and Akanoc  
3 Solutions, Inc. ("Akanoc"). I am also a named Defendant in this action. The facts set forth in this  
4 declaration are of my own personal knowledge and I could competently testify to them if called as a  
5 witness.

6 1. I am submitting this declaration in support of Defendants' opposition to Louis  
7 Vuitton Malletier's ("Vuitton") motion for modification of order and sanctions.

8 2. The photographs attached as Exhibit "A" to Vuitton's motion for modification of  
9 order and sanctions are photographs of the CPRO database used by Defendants in the course of their  
10 business about which I testified during my depositions in April 2008 and which was provided to  
11 Vuitton.

12 3. The CPRO database is a real-time database that lists the Internet protocol ("IP")  
13 addresses currently in use, the corresponding customer number of the customer leasing that IP  
14 address and the physical location, in Defendants' warehouse, of Internet servers associated with  
15 those IP addresses. The CPRO database also may contain notes that are input by Defendants'  
16 technical staff, such as when IP addresses are added to servers or removed from servers or when a  
17 server is reset or rebooted.

18 4. The CPRO database does not give Defendants the ability to distinguish, examine or  
19 monitor any content on Internet servers.

20 5. The CPRO database does not give Defendants the ability to distinguish between  
21 publicly available content and private content stored on Internet servers.

22 6. One of the five servers identified by Vuitton for inspection was no longer in service  
23 so it had been stored without change to be ready for the inspection on March 25, 2009.

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25 ///

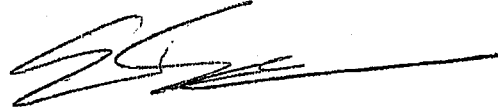
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27 ///

28 164847.1-10562-002-4/24/2009

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct.

3 Executed at Fremont, California on April 24, 2009.

4  
5 

6 STEVE CHEN