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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 MALLETIER, S.A.,

Plaintiff,

vs.

AKANOC SOLUTIONS, INC., et al.,

Defendants.

) Case No.: C 07-3952 JW (HRL)

) **DECLARATION OF JAMES A. LOWE IN**
) **SUPPORT OF DEFENDANTS' MOTION**
) **TO REQUIRE PLAINTIFF LOUIS**
) **VUITTON TO "PARE DOWN" ITS**
) **INFRINGEMENT CONTENTIONS**
) **FOR TRIAL**

) Date: June 15, 2009

) Time: 9:00 a.m.

) Ctrm.: 8, 4th Floor

1 I, JAMES A. LOWE, declare:

2 1. I am an attorney duly licensed to practice law before this Court and am a partner in
3 the law firm of Gauntlett & Associates, counsel of record for defendants Managed Solutions Group,
4 Inc., Akanoc Solutions, Inc. and Steve Chen (“Defendants”).

5 2. I have personal knowledge of the facts stated in this Declaration and could testify
6 competently to them if called upon as a witness.

7 3. This Declaration is submitted in support of Defendants’ Motion to Require Plaintiff
8 Louis Vuitton (“Vuitton”) to “Pare Down” its Infringement Contentions for Trial.

9 4. Attached as **Exhibit “1541”** is a 1 page sample verdict form prepared by my office.
10 It covers a single contributory copyright infringement claim (alleged infringement of Vuitton’s
11 “*Multicolor Monogram-White Print*” copyrighted work) by a single defendant (Managed Solutions
12 Group, Inc.) at one accused website (Ape168.com).

13 5. Attached as **Exhibit “1542”** is a 1.5 page sample verdict form also prepared by my
14 office. This verdict form covers a single contributory trademark infringement claim (alleged
15 infringement of the “*Louis Vuitton (Interlocked Letters) Design*” trademark) by a single defendant
16 (Managed Solutions Group, Inc.) at one accused website (Ape168.com).

17 6. These sample verdict forms represent the minimum findings a jury needs to make as
18 to each alleged infringement of a Vuitton mark or copyrighted work, by each defendant, at each
19 accused website.

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

22 Executed at Irvine, California on May 11, 2009.

23
24 s/ James A. Lowe

25 _____
James A. Lowe