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Attorneys for Defendants
Akanoc Solutions, Inc.,
Managed Solutions Group, Inc.
and Steven 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

) Hon. Magistrate Judge Howard R. Lloyd

) **DECLARATION OF STEVEN CHEN IN**
) **SUPPORT OF MOTION TO COMPEL**
) **THE DEPOSITION OF PLAINTIFF**
) **LOUIS VUITTON MALLETIER, S.A.**

) [Fed. R. Civ. P. 30(b)(6), 37(a)]

) Date: April 22, 2008

) Time: 10:00 a.m.

) Dept.: Courtroom 2, 5th Floor

1 I, STEVEN CHEN, declare as follows:

2 I am the President and founder 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 MSG's Motion to Compel the
7 Deposition of Plaintiff Louis Vuitton Malletier, S.A. ("LV")

8 2. MSG's and Akanoc's operations, including all of its offices, its data center and all of
9 its servers, are currently located (and have always been located) in Fremont, California and San Jose,
10 California. Neither MSG nor Akanoc have ever had any offices, data centers, servers or other
11 operations in New York or anywhere else outside of California. MSG and Akanoc have never
12 utilized any third-party servers or other support in New York or anywhere else outside of Fremont or
13 San Jose, California. To the extent that the "DomainTools.com" printouts LV's counsel attached as
14 Exhibit "B" to his declaration appear to indicate otherwise, they are simply incorrect.

15 3. On April 8, 2008 and April 9, 2008, LV will take the deposition of Akanoc, MSG and
16 myself at LV's counsel's office in Glendale, California. I have agreed to travel to Southern
17 California to be deposed at LV's counsel's office as the designee of Akanoc and MSG.

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

20 Executed in Glendale, California on this 7th day of April, 2008.

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23
24 
25 STEVEN CHEN

1 I, STEVEN CHEN, declare as follows:

2 I am the President and founder 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 MSG's Motion to Compel the
7 Deposition of Plaintiff Louis Vuitton Malletier, S.A. ("LV")

8 2. MSG's and Akanoc's operations, including all of its offices, its data center and all of
9 its servers, are currently located (and have always been located) in Fremont, California and San Jose,
10 California. Neither MSG nor Akanoc have ever had any offices, data centers, servers or other
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16 3. On April 8, 2008 and April 9, 2008, LV will take the deposition of Akanoc, MSG and
17 myself at LV's counsel's office in Glendale, California. I have agreed to travel to Southern
18 California to be deposed at LV's counsel's office as the designee of Akanoc and MSG
19

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 in _____, California on this ____ day of April, 2008.

23
24 _____
25 STEVEN CHEN
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