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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

) Hon. James Ware

) **DECLARATION OF JULIANA LUK IN
SUPPORT OF DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT**

) Date: June 23, 2008

) Time: 9:00 a.m.

) Dept.: Courtroom 8, 4th Floor

) Discov. Cut-off: April 29, 2008

) Last Day to Hear

) Dispositive Motions: June 30, 2008

) Pre-Trial Conf: Sept. 8, 2008

) Trial Date: None Set

1 I, JULIANA LUK, declare as follows:

2 I am an employee of Defendant Akanoc Solutions, Inc. ("Akanoc"). The facts set forth in
3 this declaration are of my own personal knowledge, and I could competently testify to them if called
4 as a witness.

5 1. I am submitting this declaration in support of Defendants' motion for summary
6 judgment

7 2. My sole responsibility as an employee of Defendant is to respond to all types of
8 Internet abuse issues, including complaint notices that a domain or website is allegedly using
9 infringing or counterfeit content (normally received via email).

10 3. Upon receipt of complaint notices, I ping the allegedly infringing domain name to
11 determine the IP address of the domain.

12 4. I then compare the IP address to the list of 30,000 IP addresses assigned to
13 Defendants Akanoc Solutions, Inc. and Managed Solutions Group, Inc. in order to determine if the
14 IP address is within their IP range.

15 5. If I find that the domain is within the IP range assigned to Defendants Akanoc
16 Solutions, Inc. and Managed Solutions Group, Inc., I send the customer assigned that IP address a
17 "takedown" email warning them that they must remove the infringing content.

18 6. If I receive a further complaint about an IP address and I recall having already sent a
19 takedown email to the customer assigned that IP address, I will request a technician to unplug the
20 server using that customer's IP address, thus making that domain nonfunctional.

21 7. Managed Solutions Group and Akanoc Solutions' regular practice is to send "take
22 down" notices to their customers if there is any complaint of activity from an IP address that violates
23 the "acceptable use policy."

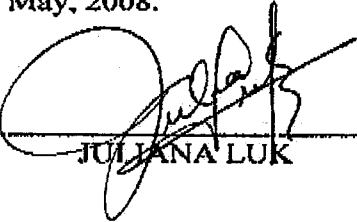
24 8. Whenever the defendant companies receive complaints of trademark or copyright
25 infringement, they immediately forward the complaint to their customer about the complaint with
26 instructions that the customer "take down" the offending material.

27 9. The customer is warned that violation of the acceptable use policy can result in
28 termination of service.

1 10. As an employee of Defendant, my entire job is to send out such complaint notices
2 daily.

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

5 Executed at Chino Hills, California on this 19th day of May, 2008.

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JULIANA LUK