

1 **GAUNTLETT & ASSOCIATES**

David A. Gauntlett (SBN 96399)

2 James A. Lowe (SBN 214383)

3 Brian S. Edwards (SBN 166258)

Christopher G. Lai (SBN 249425)

4 18400 Von Karman, Suite 300

Irvine, California 92612

5 Telephone: (949) 553-1010

Facsimile: (949) 553-2050

6 jal@gauntlettlaw.com

bse@gauntlettlaw.com

7 cl@gauntlettlaw.com

8 Attorneys for Defendants

9 Akanoc Solutions, Inc.,

Managed Solutions Group, Inc.

10 and Steve Chen

11  
12 **UNITED STATES DISTRICT COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

14  
15 LOUIS VUITTON MALLETTIER, S.A.,

16  
17 Plaintiff,

18 vs.

19  
20 AKANOC SOLUTIONS, INC., et al.,

21  
22 Defendants.

) Case No.: C 07-3952 JW

) Hon. James Ware

) **DECLARATION OF STEVE CHEN IN**  
) **SUPPORT OF DEFENDANTS'**  
) **SUPPLEMENTAL MOTION FOR**  
) **SUMMARY JUDGMENT**

) Date: September 8, 2008

) Time: 9:00 a.m.

) Dept.: Courtroom 8, 4<sup>th</sup> Floor

1 I, STEVE CHEN, declare as follows:

2 I am the President and manager of Managed Solutions Group, Inc. ("MSG") and of 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' supplemental motion for  
7 summary judgment with regard to plaintiff Louis Vuitton Malletier, S.A.'s ("Vuitton") First  
8 Amended Complaint in this action.

9 2. Attached as **Exhibit "1505"** is Akanoc Solutions Inc.'s Interim Designation of Agent  
10 to Receive Notification of Claimed Infringement Form filed with the United States Copyright Office  
11 on November 30, 2007. The Designation accurately lists my mailing address, e-mail address,  
12 facsimile number, and telephone number.

13 3. Attached as **Exhibit "1506"** is Managed Solutions Group Inc.'s Interim Designation  
14 of Agent to Receive Notification of Claimed Infringement Form filed with the United States  
15 Copyright Office on November 30, 2007. The Designation accurately lists my mailing address, e-  
16 mail address, facsimile number, and telephone number.

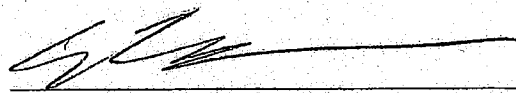
17 4. I am the Agent Designated to Receive Notification of Claimed Infringement for  
18 Defendants Akanoc and MSG under the Digital Millennium Copyright Act ("DMCA").

19 5. I received no notification sent to me by Vuitton as the DMCA Designated Agent for  
20 MSG or Akanoc concerning the 72 new websites listed in paragraph 31 of Vuitton's First Amended  
21 Complaint ("FAC"). These 72 websites are: 315EC.com, at88.com, bag1881.net, bag4sell.com,  
22 bigworldshoes.com, bizyao.com, brandfashioner.com, brandstreets.com, eastarbiz.com,  
23 eastarbiz.net, ebuynike.com, ecshoes.com, egotobuy.com, emsyou.com, eshoes99.net, famous-  
24 shop.com, fansjersey.com, guccifendi.com, gz-free.com, handbagsell.com, imitation-gold.com,  
25 innike.com, lkkfashion2006.com, llouisvuitton.com, longtimegroup.com, louis-vuitton-bags.org,  
26 louisvuittonbagz.com, lovernike.com, luxelike.com, luxury2us.com, lvbagz.com, lv-handbag.com,  
27 lv-nike.com, mailgoods.com, myshoes99.com, nike558.com, nikeexp.com, nikeshoesoffer.com,  
28 nikewto.com, nonstopbeauty.com, pfcstation.com, pickhiphop.com, pickyourgoods.com,

1 pickyourorder.com, pro-jordan.com, queen-bag.com, replica-ebags.com, replicabc.com, rrgnl.com,  
2 shoes-order.com, soapparel.com, soapparel.net, sportsvendor.biz, sunny7shoes.com, super925.com,  
3 swisshours.biz, top-handbag.com, tytrade88.com, watchesnreplica.com, watchesreplica.net,  
4 watchnreplica.net, wearonline.net, wendy929.net, wendyluxury.com, worldkeytrade.com,  
5 yeahebay.com, yseenet.net.

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

8 Executed at Fremont, California on this 4<sup>th</sup> day of August, 2008.

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11 STEVE CHEN  
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**EXHIBIT 1505**

Interim Designation of Agent to Receive Notification  
of Claimed Infringement

Full Legal Name of Service Provider: Akanec Solutions, Inc

Alternative Name(s) of Service Provider (including all names under which the service provider is doing business): Akanec.com ; Cololacarte.com ;  
dediwebhost.com

Address of Service Provider: 45535 Northport Loop East, Fremont, CA 94538

Name of Agent Designated to Receive Notification of Claimed Infringement: Steve Chen

Full Address of Designated Agent to which Notification Should be Sent (a P.O. Box or similar designation is not acceptable except where it is the only address that can be used in the geographic location):

45535 Northport Loop East, Fremont, CA 94538

Telephone Number of Designated Agent: 510-580-5588

Facsimile Number of Designated Agent: 510-580-5589

Email Address of Designated Agent: Steve@akanec.com

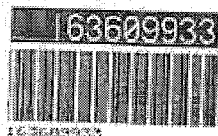
Signature of Officer or Representative of the Designating Service Provider:

Date: NOV 15, 2007

Typed or Printed Name and Title: STEVE CHEN, General Manager

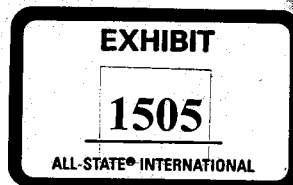
Note: This Interim Designation Must be Accompanied by a \$80 Filing Fee Made Payable to the Register of Copyrights.

SCANNED 01-03/2008



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NOV 30 2007  
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**EXHIBIT 1506**

Interim Designation of Agent to Receive Notification  
of Claimed Infringement

Full Legal Name of Service Provider: Managed Solutions Group, Inc

Alternative Name(s) of Service Provider (including all names under which the service  
provider is doing business): Managedsg-inc.com

Address of Service Provider: 45535 Northport Loop East, Fremont, CA 94538

Name of Agent Designated to Receive  
Notification of Claimed Infringement: Steve Chen

Full Address of Designated Agent to which Notification Should be Sent (a P.O. Box  
or similar designation is not acceptable except where it is the only address that can be used in the geographic  
location): 45535 Northport Loop East, Fremont, CA 94538

Telephone Number of Designated Agent: 510-580-5588

Facsimile Number of Designated Agent: 510-580-5589

Email Address of Designated Agent: Steve@Managedsg-inc.com

Signature of Officer or Representative of the Designating Service Provider:

Date: Nov 15, 2007

Typed or Printed Name and Title: STEVE CHEN, General Manager

Note: This Interim Designation Must be Accompanied by a \$80 Filing Fee  
Made Payable to the Register of Copyrights.

SCANNED 01-03/2008

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