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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)

) Hon. Magistrate Judge Howard R. Lloyd

) **DECLARATION OF CHRISTOPHER LAI**  
) **IN OPPOSITION TO VUITTON'S**  
) **ADMINISTRATIVE MOTION RE**  
) **DISCOVERY ORDERS**

1 I, CHRISTOPHER LAI, declare:

2 1. I am an attorney duly licensed to practice law before this Court and am an associate 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' opposition to plaintiff Louis  
8 Vuitton Malletier, S.A.'s ("LV") Administrative Motion Re Inspection Protocol.

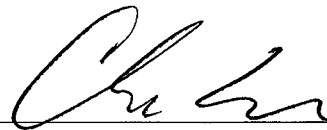
9 4. I have personally spoken with two forensic examiners at Digital Mountain, Inc., a  
10 company specializing in computer forensic examination located at 553 Pilgrim Drive, Suite C,  
11 Foster City, California, to discuss possible means of conducting an Internet server inspection in  
12 order to distinguish between private information and publically available contents stored on  
13 Defendants' Internet servers.

14 5. I also contacted other organizations, including the computer science departments of  
15 Stanford University, the University of California, Berkeley, San Francisco State University, and the  
16 University of San Francisco, in an effort to locate a forensic examiner who could perform such a  
17 search.

18 6. None of the forensic examiners that I spoke with were aware of a means of  
19 performing an Internet server search in such a way that distinguishes between private information  
20 and publically available contents stored on Defendants' Internet servers.

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

23 Executed at Irvine, California on November 12, 2008.

24 

25 \_\_\_\_\_  
26 Christopher Lai