

1 PILLSBURY WINTHROP LLP
 WILLIAM F. ABRAMS 88805
 2 JOSEPH R. TIFFANY II 67821
 NICOLE M. TOWNSEND 189655
 3 2475 Hanover Street
 Palo Alto, CA 94304-1114
 4 Telephone: (650) 233-4500
 Facsimile: (650) 233-4545
 5

6 Attorneys for Plaintiff and Counterclaim Defendant
 POSTX CORPORATION

7 UNITED STATES DISTRICT COURT
 8 NORTHERN DISTRICT OF CALIFORNIA
 9 SAN FRANCISCO DIVISION

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 POSTX CORPORATION,
 Plaintiff,
 vs.
 SECURE DATA IN MOTION, INC., d/b/a
 SIGABA,
 Defendant.

 AND RELATED COUNTERACTIONS.

No. C 02-04483 SI & C 03-00521 SI
DECLARATION OF WILLIAM F. ABRAMS IN SUPPORT OF POSTX CORPORATION'S OPPOSITION TO SIGABA'S DECEMBER 14, 2004 MOTION TO COMPEL

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 20 I, William F. Abrams, declare:

21 1. I am a member of the State Bar of California and am a partner with the law
 22 firm of Pillsbury Winthrop LLP, counsel of record for Plaintiff and Counterclaim
 23 Defendant PostX Corporation ("PostX").

24 2. I have personal knowledge of the matters stated in this declaration, and if
 25 called upon to testify as a witness thereto, I could and would competently do so. I submit
 26 this declaration in support of PostX's Opposition to Sigaba's December 14, 2004 Letter
 27 Brief requesting that the Court compel PostX to produce certain documents and allow
 28 testimony related thereto.

1 3. Entry No. 18 to PostX's privilege log identifies an email dated September
2 13, 2002 in which Thampy Thomas forwarded an email from David A. Jakopin, a partner at
3 Pillsbury Winthrop who was engaged to provide legal advice to PostX, regarding a draft
4 work-product Complaint against Sigaba to Cayce Ullman, Scott Olechowski, Michael Weir
5 and Dean Mayer. The recipients were senior PostX employees who were being provided
6 information related to legal analysis of potential PostX claims against Sigaba and whose
7 consideration of the draft Complaint against Sigaba was being sought.

8 4. Entry No. 34 to PostX's privilege log identifies email correspondence dated
9 January 9, 2003 from Thampy Thomas to Brian Gilbreath, Jett Winter, Cayce Ullman and
10 Dean Mayer. The recipients were senior PostX employees and the email related to
11 litigation strategy and legal advice provided by Pillsbury Winthrop and Pillsbury Winthrop
12 work-product discussed by PostX's counsel.

13 5. Attached as Exhibit A is a re-redacted copy of the document identified as
14 Entry No. 35 to PostX's privilege log. This document, and others identified in Sigaba's
15 letter brief, were reconsidered for assertions of privilege. Upon further consideration, the
16 initial redaction was slightly modified. The portion of PXT0071506-09 that remains
17 redacted reflects litigation strategy and advice of counsel regarding claims related to
18 PostX's patents.

19 6. Attached as Exhibit B is a re-redacted copy of the document identified as
20 Entry No. 36 to PostX's privilege log. This document, and others identified in Sigaba's
21 letter brief, were reconsidered for assertions of privilege. Upon further consideration, the
22 initial redaction was slightly modified. The portion of PXT0214105-06 that remains
23 redacted reflects litigation strategy and advice of counsel.

24 7. Entry Nos. 1-3, 13-16, 45 and 133-135 to PostX's privilege log identify
25 email correspondence from September 11-12, 2002 reflecting and relating to PostX's
26 discussions with counsel, legal advice, and decision to file suit against Sigaba.

27 8. Entry Nos. 1 and 4 to Alloy Ventures' privilege log identify email
28 correspondence from September 23-24, 2002 in which a request for certain information

1 made by PostX's counsel is forwarded to individuals likely to have that information.

2 9. Entry No. 2 to Alloy Ventures' privilege log identifies a January 9, 2004
3 email from Thampy Thomas to Mark Leslie, Peter Ziebelman, Joseph Rizzi and Yogen
4 Dalal. Each of the recipients is a member of PostX's Board of directors. In the email, Mr.
5 Thomas relayed impressions of counsel relating to the litigation to PostX's Board.

6 10. Entry Nos. 3 and 5 to Alloy Ventures' privilege log identify email
7 correspondence from September 11-12, 2002 reflecting and relating to PostX's discussions
8 with counsel, legal analysis and advice, and consideration of claims against Sigaba.

9 11. Copies of excerpts from the November 12, 2004 deposition of Robert Cook
10 are attached hereto as Exhibit C.

11 12. Copies of Sigaba's Board minutes from meetings held on April 14, 2003,
12 June 18, 2003, July 21, 2003, September 15, 2003, November 20, 2003, and April 29, 2004
13 are attached hereto as Exhibit D.

14 13. Copies of Sigaba's Board minutes from meetings held on February 19, 2004
15 and April 14, 2004 are attached hereto as Exhibit E.

16 14. Examples of full page redactions by Sigaba that do not appear to be included
17 in its privilege log include: SD0003154, SD0003222, SD0003273, SD0003298,
18 SD0003313, SD0003319, SD0003396, and SD0003856 attached hereto as Exhibit F.
19 Because Sigaba's privilege log does not include any Bates Numbers, it is impossible for
20 PostX to identify whether particular redacted documents are included in Sigaba's privilege
21 log. A copy of Sigaba's July 22, 2004 privilege log is attached hereto as Exhibit G.

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

24 Executed December 21, 2004 in Palo Alto, California

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_____/s/

William F. Abrams