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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**  
) **OPPOSITION TO MOTION TO COMPEL**  
) **PRODUCTION OF ELECTRONIC**  
) **COMMUNICATIONS ON INTERNET**  
) **SERVERS**

) Date: April 29, 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. MSG and Akanoc are Internet Service Providers (ISPs) that provide transmission,  
7 routing, and connection for digital online communication for their customers but have no role in  
8 choosing, authorizing, modifying or monitoring the information stored or transmitted by their  
9 servers.

10 2. A single IP address can be used by a single Website or it can be used by tens or  
11 hundreds or even thousands of Websites. The Defendants do not control or know what specific use is  
12 made of each IP address rented to others because they provide unmanaged IP addresses and servers.

13 3. MSG and Akanoc only authorize a client, normally a web hosting reseller, to use  
14 using one or more of its Internet servers, one or more IP addresses on a monthly basis. MSG and  
15 Akanoc provide servers with standard hosting application software installed and give password  
16 control of the server to their customers for a minimal monthly charge.

17 4. Because MSG's and Akanoc's Internet servers are physically located in San Jose,  
18 California at the main U.S. west coast gateway to the Internet, their services are sought after by  
19 many companies needing Internet access for telephone services, for downloading large digital files  
20 on demand, for reselling Web hosting services to end users, etc.

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 in Glendale, California on this 2<sup>nd</sup> day of April, 2008.

24  
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26   
27 STEVEN CHEN  
28

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