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Attorneys for Defendants Cisco Systems, Inc.,  
John Chambers, Thomas Lam, and Owen Chan

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

DOE I, DOE II, Ivy HE, DOE III, DOE  
IV, DOE V, DOE VI, ROE VII, Charles  
LEE, ROE VIII, and LIU Guifu,

Plaintiffs,

vs.

CISCO SYSTEMS, INC., John  
CHAMBERS, Thomas LAM, Owen  
CHAN, and DOES 1-100,

Defendants.

Case No. 5:11-cv-02449-JF

**NOTICE OF PENDENCY OF RELATED  
ACTION OR PROCEEDING**

Action Filed: May 19, 2011

Judge: Hon. Jeremy Fogel

Dept: Courtroom 3, 5th Floor

1 Defendants, by and through their attorneys, hereby submit this Notice of Pendency of  
2 Related Action or Proceeding pursuant to Civil L.R. 3-13.

3 1. This action involves all or a material part of the same subject matter and many of  
4 the same parties as *Daobin et al. v. Cisco Systems, Inc., et al.*, No. 8:2011-cv-01538 (D. Md.,  
5 Greenbelt Div.) (the "Maryland" action). Plaintiffs in the Maryland action are individuals Du  
6 Daobin, Zhou Yuanzhi, and Liu Xianbin; Defendants are Cisco Systems, Inc., John Chambers,  
7 Thomas Lam, Owen Chan, and Rick Justice. The Maryland Complaint alleges that Defendants  
8 sold internet routers and related hardware and services to governmental entities in the People's  
9 Republic of China for the purpose of facilitating the Chinese government's construction of the  
10 "Golden Shield" internet backbone, allegedly with knowledge that the Chinese government  
11 would seek to use the Golden Shield to commit international law violations against political  
12 activists in China. The Complaint asserts claims under the Alien Tort Statute ("ATS"), Torture  
13 Victim Protection Act ("TVPA"), and state common law.

14 2. The Maryland action is factually and legally related to this action. All of the  
15 Defendants in this action are also defendants in the Maryland action. The international law  
16 claims under the ATS and TVPA in this action, as well as the common law claims for assault,  
17 battery, and like, are also at issue in the Maryland action. And the alleged wrongdoing in this  
18 action — provision of internet routers and related equipment and services to the government of  
19 China for the purpose of facilitating the Chinese government's construction of the "Golden  
20 Shield" internet backbone, allegedly with knowledge that the Chinese government would seek to  
21 use the "Golden Shield" to commit international law violations against Falun Gong practitioners  
22 in China — are nearly identical to those alleged in the Maryland action.

23 3. Coordination between this action and the Maryland action would likely avoid  
24 conflicts, conserve resources, and promote an efficient determination of the actions. To this end,  
25 Defendants have moved for a stay of the Maryland action pending disposition of their  
26 forthcoming motion to dismiss this action, and in conjunction with that stay motion are assessing  
27 the availability and propriety of transfer pursuant to 28 U.S.C. § 1407 (Multi District Litigation  
28

1 Procedures) or otherwise.

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3 DATED: July 21, 2011

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QUINN EMANUEL URQUHART  
& SULLIVAN, LLP

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By: /s/ Kathleen M. Sullivan  
Kathleen M. Sullivan

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Attorneys for Defendants

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