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

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

14 Doe I, Doe II, Ivy He, Doe III, Doe IV, Doe V,
Doe VI, Roe VII, Charles Lee, Roe VIII, Liu
15 Guifu, and those individuals similarly situated,

16 Plaintiffs,

17 v.

18 Cisco Systems, Inc., John Chambers, Thomas
Lam, Owen Chan, and Does 1-100,

19 Defendants.
20

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

**DEFENDANTS' RULE 44.1 NOTICE OF
INTENT TO RAISE ISSUE OF FOREIGN
LAW ON MOTION TO DISMISS**

Hearing date: December 16, 2011

Time: 10:00 a.m.

Action Filed: May 19, 2011

Judge: Hon. Jeremy Fogel

Dept: Courtroom 3, 5th Floor

21 TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

22 PLEASE TAKE NOTICE that pursuant to Rule 44.1 of the Federal Rules of Civil
23 Procedure, defendants Cisco Systems, Inc., John Chambers, Thomas Lam, and Owen Chan
24 (collectively, "Defendants") hereby give notice of their intent to raise issues of Chinese law that
25 may arise in connection with Defendants' motion to dismiss the complaint. Pursuant to Rule 44.1
26 and to assist the Court, Defendants will submit the Declaration of John Chu, a licensed attorney
27 authorized and engaged in the practice of law in the People's Republic of China, and a partner at
28 the Jun He Law Offices in China.

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The Motion is scheduled to be heard on or after December 16, 2011.

DATED: New York, New York
August 4, 2011

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/ Kathleen M. Sullivan
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's ECF System.

Dated: August 4, 2011

/s/ Arthur Roberts
Arthur Roberts