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13
14 **UNITED STATES DISTRICT COURT FOR THE**
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

15 **CV 11-02449**

Case No.

PSG

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

19 Plaintiffs,

20 vs.

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

24 Defendants.

**DECLARATION OF TERRI MARSH IN
SUPPORT OF PLAINTIFFS' MOTION TO
COMMENCE AND PROCEED THROUGH
APPOINTED NEXT FRIEND**

Action Filed: May 19, 2011

Hearing Date: To Be Determined

DECLARATION OF TERRI MARSH, ESQ.

I, TERRI MARSH, declare as follows:

1. I am an attorney at law duly licensed to practice law in the District of Columbia and have an application pending to appear *pro hac vice* before the U.S. District Court for the Northern District of California in this action. I am currently the Director of the Human Rights Law Foundation and one of the attorneys of record for Plaintiffs. I am one of the attorneys responsible for this file and have personal knowledge of the facts stated herein, and if called as a witness I would and could competently testify thereto.

2. Since June of 2010, I have been in regular telephone contact with Roe III, a close personal friend to both Doe III and Doe IV. He has been easy to contact.

3. In June of 2010, I spoke with Roe III with the aid of a translator and explained the concept of Next Friend Representation.

4. Roe III indicated he clearly understands the responsibility of serving as a Next Friend, and stated that he is willing and able to serve in that capacity for both Doe III and Doe IV.

5. Roe III stated further that he is willing to speak with us regularly on behalf of Doe III and Doe IV going forward.

6. Roe III clearly indicated that he truly desires to act in the best interests of Doe III and Doe IV.

7. On, May 13, 2011, I sent a Next Friend Authorization to Roe III with the assistance of Yale Law student, Can Sun, who has been working on this case for HRLF as a law intern. Can Sun hand delivered the Next Friend Authorization to Roe III on May 14, 2011.

8. On, May 17, 2011, I received Roe III's signed Next Friend Authorization for Doe III and Doe IV via Federal Express mail.

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

Executed this seventeenth day of May 2011, at Washington, D.C.

Terri E. Marsh

Terri E. Marsh, Esq.