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RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
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ADR

**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.

CV

Case No. 11-02449

PSG

**DECLARATION OF ROE III IN  
SUPPORT OF PLAINTIFFS' MOTION  
TO COMMENCE AND PROCEED  
THROUGH APPOINTED NEXT  
FRIENDS**

Hearing Date: To Be Determined

ORIGINAL

**DECLARATION OF ROE III**

I, ROE III, declare as follows:

1. I am a Canadian citizen currently residing in Toronto, Canada.
2. I wish to proceed as the Next Friend of both Doe III and Doe IV in this action.
3. My friend, Doe III is currently in prison in secure facilities in China.
4. Access to Doe III in prison is extremely limited. Chinese officials substantially limit his availability to visitors, and to the extent that visits are permitted, they are closely monitored.
5. I have been a close personal friend to Doe III since 1998, before the onset of the persecution of Falun Gong in China.
6. After the onset of the persecution of Falun Gong in China, I spent considerable time with Doe III to discuss how to withstand the persecutory campaign. We collaborated to download information about Falun Gong and to help distribute this information to people in China in order to educate people about the severity of the persecutory campaign and to seek help. I attempted to acquire an attorney to represent Doe III in China. I remain in touch with Doe III's family.
7. I am truly dedicated to the best interests of Doe III in this action.
8. My friend, Doe IV was in prison in secure facilities in China until recently when he was released.
9. Doe IV is now under round-the-clock surveillance and monitoring by Chinese security. Access to Doe IV is extremely limited for that reason.
10. I have been a close personal friend to Doe IV since early 2003.
11. I have been close with Doe IV and his family before, during and after Doe IV's imprisonment. I contacted Doe IV's father after Doe IV's arrest, discussed with Doe IV's father how we could rescue Doe IV, and attempted to acquire an

1 attorney to represent Doe IV after his family expressed an interest in finding one.  
2 12. Prior to Doe IV's imprisonment in 2003 in Hebei Province, I communicated  
3 extensively with Doe IV.  
4 13. I am careful not to communicate with Doe IV while he is under surveillance.  
5 My access to him is very limited.  
6 15. Prior to Doe IV's release, I communicated with Doe IV's family to the extent  
7 possible. Based on my communication with them, it is clear to me that they cannot  
8 act as Next Friend for Doe IV because they also reside in China and their  
9 communication with those outside of China are monitored.  
10 16. I am truly dedicated to acting in the best interests of Doe IV in this action.  
11 17. In June of 2010, I spoke with Attorney Terri Marsh. With the aid of a  
12 translator, Terri explained to me the concept of Next Friend Representation.  
13 18. I clearly understand the responsibility of serving as a Next Friend, and I am  
14 willing and able to serve in that capacity for both Doe III and Doe IV.  
15 19. I am willing to speak with Terri Marsh regularly on behalf of Doe III and  
16 Doe IV going forward.  
17 20. On, August 16, 2010, I received written authorization from Doe III's wife to  
18 represent Doe III as next friend in this case. In December 2010, a month after Doe  
19 IV was released from prison, I received oral authorization from Doe IV to represent  
20 him as next friend in this case.  
21 21. On, May 15, 2011, I received the Next Friend Authorization and Retainer for  
22 Doe III and Doe IV directly from Can Sun, a Yale law student who has been  
23 assisting with this case.  
24 22. On, May 15, 2011, I hand-delivered the signed Next Friend Authorization  
25 and Retainer for Doe III and Doe IV to Human Rights Law Foundation law intern,  
26 Can Sun.

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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 15th day of May, 2011, at Toronto, Canada.

*Roe III*

Roe III