Illinois Computer Research, LLC v. Google Inc.

Case 1:07-cv-05081

Document 78-7 Filed 12/20/2007

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EXHIBIT F

IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

ILLINOIS COMPUTER RESEARCH, LLC,))
Plaintiff and Counterclaim Defendant,)
ν.)
GOOGLE, INC.,	į
Defendant,) }
and	
FISH & RICHARDSON P.C.,) No. 07 C 5081
Defendant, Counterclaimant and Third-Party Plaintiff,	Judge Rebecca R. Pallmeyer
1mra-1 arty 1 tamigg,) Magistrate Judge Maria Valdez
ν.) Wingistrate Funge Waria Variation
SCOTT C. HARRIS,)
Third-Party Defendant and)
Counterclaimant,)
ν.	ý
The second of th)
FISH & RICHARDSON P.C.,)
Defendant, Counterclaimant, Third-)
Party Plaintiff and Counterclaim) \
Defendant.)

DECLARATION OF DOROTHY WHELAN IN SUPPORT OF FISH & RICHARDSON'S MOTION TO COMPEL AND MEMORANDUM OF LAW IN OPPOSITION TO HARRIS'S CROSS-MOTION TO COMPEL

- I, Dorothy P. Whelan, am a principal at Fish & Richardson, P.C. and have knowledge of the underlying facts.
- 1. Fish & Richardson is a Massachusetts professional corporation. It has over 400 lawyers in offices across the country practicing law in a variety of areas of the law, in particular in the intellectual property field.

- 2. For many years, Fish & Richardson has promulgated e-mail and confidentiality policies applicable to all Fish & Richardson personnel, including principals of the firm such as Scott Harris. Copies of the Fish & Richardson e-mail and confidentiality policies in effect in 2007 are attached as Exhibit 1 and 2, hereto.
 - 3. Section III of the e-mail policy recites that:

REDACTED PURSUANT TO STIPULATED PROTECTIVE ORDER

4. Fish & Richardson's confidentiality policy states, among other things, that the

REDACTED PURSUANT TO STIPULATED PROTECTIVE ORDER

5. Fish & Richardson's e-mail and confidentiality policies are posted on a daily basis on the Fish & Richardson systems. Specifically, every firm computer connected to the Fish & Richardson system is set up to default to a firm intranet browser titled "Fishnet". The e-mail and confidentiality policies are posted and available to every employee on Fishnet, including principals such as Scott Harris.

Pursuant to 28 U.S.C Section 1746, I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Dated: 12007

Dorothy P. Whelan

EXHIBIT 1

REDACTED PURSUANT TO STIPULATED PROTECTIVE ORDER

EXHIBIT 2

REDACTED PURSUANT TO STIPULATED PROTECTIVE ORDER