

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
GREENBELT DIVISION**

COSTAR REALTY INFORMATION and  
COSTAR GROUP, INC.,

Plaintiffs,

V.

ATKINSON-HUNT et al.

Defendants.

Civil Action No. PJM 06 CV 0655

**DECLARATION OF STEVE WILLIAMS  
IN SUPPORT OF PLAINTIFFS' RESPONSE IN OPPOSITION  
TO DEFENDANT ATKINSON HUNT'S MOTION TO DISMISS**

1. My name is Steve Williams. I am an individual over the age of eighteen (18) years. I have personal knowledge of the matters set forth in this Declaration and would be willing and able to testify thereto if and when called upon to do so.

2. I am currently a legal assistant for CoStar Realty Information and CoStar Group, Inc. ("CoStar") in Bethesda, Maryland. I make this Declaration in support of Plaintiff's Response In Opposition to Defendant's Motion to Dismiss or Transfer.

3. On various days in March 2005 through June 2005, CoStar received telephone voice messages on a special phone line that CoStar maintains to track unauthorized use of its commercial real estate information services. This special line is a dedicated phone line in CoStar's Bethesda office that receives phone messages from telephone numbers that CoStar places in a number of "seed" listings in its services. The seed listings contain fictional information regarding either nonexistent properties or existing properties with incorrect profiles and are placed in CoStar's services to track whether individuals who do not have valid CoStar licenses have obtained unauthorized

access to CoStar's databases. Placement of seed listings in databases is a standard practice utilized by owners of intellectual property in databases to identify unauthorized uses of that intellectual property.


4. The telephone messages identified in Paragraph 3 of my Declaration immediately struck me as suspicious and reflective of unauthorized access to or use of the CoStar information service(s), or information obtained therefrom, by Atkinson Hunt. Because of my job responsibilities, I was aware of the recent cease and desist correspondence from CoStar to Atkinson Hunt. I also was aware that Atkinson Hunt was a marketing firm that served vendors such as janitorial and roofing companies, and the callers in these messages identified themselves as representatives of various roofing companies, calling from very similar phone numbers to Atkinson Hunt's telephone number: (856) 665-2400.

5. On or about April 1, 2005, I called one of the numbers that had called the special line that I believed to be Atkinson Hunt and a woman answered the phone by saying "Commercial Services", but then indicated I had reached "Atkinson Hunt".

6. In the telephone messages, the callers indicated they were calling for information about the call recipient's roofing needs. Thus, based on the foregoing, it appears that the callers worked at Atkinson Hunt, had access to information obtained from the CoStar information service(s), and were utilizing such information to develop sales leads on behalf of the named roofing companies (who presumably were Atkinson Hunt clients or prospective clients).

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

Executed on August 14, 2006



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STEVE WILLIAMS