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 7 *Pro Hac Vice Applications To Be Submitted*  
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11 Attorneys for Specially Appearing  
 Defendants **BODOG**  
 12 **ENTERTAINMENT GROUP S.A.**,  
 and erroneously named Specially  
 13 Appearing Defendants **BODOG.NET**  
 and **BODOG.COM**

14  
 15 UNITED STATES DISTRICT COURT  
 16 DISTRICT OF NEVADA

17 1ST TECHNOLOGY LLC,  
 18 Plaintiff,  
 19 vs.  
 20 RATIONAL ENTERPRISES LTDA.,  
 RATIONAL POKER SCHOOL  
 21 LIMITED, BODOG  
 ENTERTAINMENT GROUP S.A.,  
 22 BODOG.NET, BODOG.COM, AND  
 FUTUREBET SYSTEMS LTD.,  
 23 Defendants.

Case No: 2:06-cv-1110-RLH-GWF  
**DECLARATION OF VICTOR DE  
 GYARFAS IN SUPPORT OF  
 DEFENDANTS' OPPOSITION TO  
 PLAINTIFF 1ST TECHNOLOGY  
 LLC'S "EMERGENCY MOTION  
 FOR PERMANENT INJUNCTION"**  
  
**Date:** October 11, 2007  
**Time:** 9:00 a.m.  
**Courtroom:** 6C

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**DECLARATION OF VICTOR DE GYARFAS**

I, Victor de Gyarfás, declare as follows:

1. I am over eighteen years of age. I have personal knowledge of the facts contained herein. If called upon to testify, I could and would competently testify hereto.

2. I am an attorney at law, duly licensed to practice before all the courts of the State of California.

3. I am a partner at the law firm of Foley & Lardner LLP, counsel for Defendants, Bodog Entertainment Group S.A., Bodog.Net and Bodog.com (hereinafter “Defendants”).

4. I make this declaration in support of Defendants’ Opposition to Plaintiff 1<sup>st</sup> Technology LLC’s (hereinafter “Plaintiff”) “Emergency Motion for Permanent Injunction”.

5. Attached hereto as Exhibit 1 is a true and correct copy of .the Complaint.

6. Attached hereto as Exhibit 2 is a true and correct copy the Patent.

7. Attached hereto as Exhibit 3 is a true and correct copy of the Docket for 2:06-cv-00323-LDG-RJJ as of September 6, 2007.

8. Attached hereto as Exhibit 4 is a true and correct copy of the Docket for 2:07-cv-00475-RCJ-LRL1 as of September 6, 2007.

9. Attached hereto as Exhibit 5 is a true and correct copy of the Docket for 2:06-cv-01650-JCM-GWF as of September 6, 2007.

10. Attached hereto as Exhibit 6 is a true and correct copy of the Docket for 2:04-cv-01003-RLH-PAL as of September 6, 2007.

11. Attached hereto as Exhibit 7 is a true and correct copy of the Docket for 2:05-cv-00788-RLH-GWF.

12. Attached hereto as Exhibit 8 is a true and correct copy of Law.com article – “Meet the Original Patent Troll”.

1 13. Attached hereto as Exhibit 9 is a true and correct copy of Findarticles.com  
2 article – “Chartwell Technology Inc. Enters Into Technology License Agreement with 1<sup>st</sup>  
3 Technology LLC”.

4 14. Attached hereto as Exhibit 10 is a true and correct copy of Findarticles.com  
5 article – “Excapso Subsidiary Latest License for Advanced Multimedia Technology;  
6 Industry Leader Gains Access to 1<sup>st</sup> Technology Patents”.

7 15. Attached hereto as Exhibit 11 is a true and correct copy of Plaintiff’s Motion  
8 for Writ of Execution Re Domain Names.

9 16. Attached hereto as Exhibit 12 is a true and correct copy of King County  
10 Superior Court’s Order Granting Motion for Writ of Execution Re Domain Names.

11 17. Attached hereto as Exhibit 15 is a true and correct copy of Defendants  
12 Amended Motion for Relief from Enforcement of Plaintiff’s Writ of Execution.

13 18. Attached hereto as Exhibit 16 is a true and correct copy of Plaintiff’s  
14 Opposition to Bodog’s Motion for Relief from Enforcement of Writ of Execution.

15 19. Attached hereto as Exhibit 17 is a true and correct copy of Defendant’s  
16 Reply In Support of Amended Motion for Relief from Enforcement of Plaintiff’s Writ of  
17 Execution.

18 20. Attached hereto as Exhibit 18 is a true and correct copy of Plaintiff’s Motion  
19 for Writ of Execution Re Replacement (Additional) Domain Names.

20 21. Attached hereto as Exhibit 19 is a true and correct copy of Defendants’  
21 Opposition to Motion for Writ of Execution Re Replacement (Additional) Domain Names.

22 22. Attached hereto as Exhibit 20 is a true and correct copy of Plaintiff’s Reply  
23 In Support of Writ of Execution Regarding Additional Domain Names.

24 23. Attached hereto as Exhibit 21 is a true and correct copy of Defendants’  
25 Supplemental Memorandum Re: Cross-Motions Concerning Plaintiff’s Writ of Execution.

26 24. Attached hereto as Exhibit 22 is a true and correct copy of (Plaintiff’s)  
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1 Additional Briefing Regarding Injunctive Relief Sought by 1<sup>st</sup> Technology LLC.

2 25. Attached hereto as Exhibit 23 is a true and correct copy of [Proposed] Order  
3 Regarding Cross Motions Regarding Writ of Execution.

4 26. Attached hereto as Exhibit 24 is a true and correct copy of BMC Resources  
5 v. Paymentech, L.P., Case No. 2006-1503 (Fed. Cir. Sep. 20, 2007).

6 27. Attached hereto as Exhibit 25 is a true and correct copy of an e-mail dated  
7 September 24, 2007, from Marci Parducci, Bailiff to the Honorable John P. Erlick.

8 28. Attached hereto as Exhibit 26 is a true and correct copy of Paice LLC v.  
9 Toyota Motor Corp., 2006 WL 2385139 (E.D. Tex.).

10 29. Attached hereto as Exhibit 27 is a true and correct copy of Voda v. Cordis  
11 Corp., 2007 WL 2570614 (W.D. Okla.).

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

14 Executed this 27<sup>th</sup> day of September, 2007 at Los Angeles, California.

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16 /s/ Victor de Gyarfas  
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