

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

Eolas Technologies Incorporated,	§	
	§	
Plaintiff,	§	Civil Action No. 6:09-CV-00446-LED
	§	
v.	§	
	§	
Adobe Systems Inc., Amazon.com, Inc.,	§	JURY TRIAL
Apple Inc., Blockbuster Inc., CDW Corp.,	§	
Citigroup Inc., eBay Inc., Frito-Lay, Inc.,	§	
The Go Daddy Group, Inc., Google Inc.,	§	
J.C. Penney Company, Inc., JPMorgan	§	
Chase & Co., New Frontier Media, Inc.,	§	
Office Depot, Inc., Perot Systems Corp.,	§	
Playboy Enterprises International, Inc.,	§	
Rent-A-Center, Inc., Staples, Inc., Sun	§	
Microsystems Inc., Texas Instruments Inc.,	§	
Yahoo! Inc., and YouTube, LLC	§	
	§	
Defendants.	§	

**DECLARATION OF JOANNE DONAHUE,
DIRECTOR, GLOBAL HR TECHNOLOGY OF DEFENDANT STAPLES, INC.**

I, Joanne Donahue, provide this declaration on behalf of Defendant Staples, Inc., and declare as follows on its behalf:

1. I have personal knowledge of the facts set forth herein. If called to do so, I could and would testify competently thereto.
2. I am employed by Staples, Inc. (hereinafter "Staples"). I make this declaration on behalf of Staples in support of the Joinder by Defendant Staples, Inc. in Motion to Transfer to the U.S. District Court for the Northern District of California Pursuant to 28 U.S.C. § 1404(a).
3. I joined Staples in 1994, and my current job title is Director, Global HR Technology.

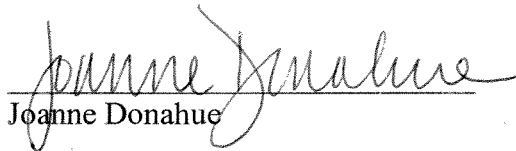
4. Staples is incorporated in the State of Delaware.

5. Staples is headquartered in the Commonwealth of Massachusetts with an address of 500 Staples Drive, Framingham, Massachusetts, and has approximately 2,800 employees at this location.

6. As of May 19, 2010, Staples had approximately 1,100 retail-store employees, and also approximately 1,200 employees at facilities other than retail stores, in the State of Texas.

7. As of May 19, 2010, Staples had approximately 5,100 retail-store employees, and also approximately 2,000 employees at facilities other than retail stores, in the State of California.

I declare the foregoing to be a true and correct statement and do so under the penalty of perjury on this 11 day of June, 2010.


Joanne Donahue