

ATTACHMENT A

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

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|--|---|---|
| Eolas Technologies Incorporated, | § | |
| | § | |
| Plaintiff, | § | Civil Action No. 6:09-CV-00446-LED |
| | § | |
| vs. | § | |
| | § | |
| Adobe Systems Inc., Amazon.com, Inc., | § | JURY TRIAL |
| Apple Inc., Argosy Publishing, 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 | § | UNDER SEAL |
| 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 GRETCHEN K. CURRAN IN SUPPORT OF
EOLAS' MOTION TO COMPEL LOG-IN INFORMATION FOR
STAPLESLINK.COM AND EWAY.COM FROM STAPLES, INC.**

I, Gretchen K. Curran, do state and declare as follows:

1. I am an attorney with the law firm of McKool Smith PC (McKool Smith), counsel for Plaintiff Eolas Technologies Incorporated (Eolas) in this action. I make this declaration in support of Eolas' Motion to Compel Log-In Information for stapleslink.com and eway.com from Staples, Inc., filed herewith. Unless otherwise stated, the matters contained in this declaration are of my own personal knowledge and, if called as a witness, I could and would testify competently to the matters set forth herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of screenshots from stapleslink.com and eway.com made on September 6, 2011.

3. Attached hereto as Exhibit 2 is a true and correct copy of an e-mail from Mr. Fasone to Ms. Hutchins dated June 7, 2011 at 4:50 pm.

4. Attached hereto as Exhibit 3 is a true and correct copy of an e-mail from Mr. Fasone to Ms. Hutchins dated June 10, 2011.

5. Attached hereto as Exhibit 4 is a true and correct copy of an e-mail from Mr. Fasone to Ms. Hutchins dated June 16, 2011.

6. Attached hereto as Exhibit 5 is a true and correct copy of an e-mail from Mr. Fasone to Ms. Hutchins dated June 22, 2011.

7. Attached hereto as Exhibit 6 is a true and correct copy of an e-mail from Ms. Hutchins to Mr. Fasone dated June 22, 2011.

8. Attached hereto as Exhibit 7 is a true and correct copy of e-mails from Mr. Fasone to Ms. Hutchins dated June 23, 24, 26, 2011.

9. Attached hereto as Exhibit 8 is a true and correct copy of e-mails from Mr. Fasone dated July 5 and 8, 2011.

10. Attached hereto as Exhibit 9 is a true and correct copy of e-mails from Mr. Fasone dated July 14 and 19, 2011.

11. Attached hereto as Exhibit 10 is a true and correct copy of a letter from Mr. Matuschak to Mr. Budwin dated July 19, 2011, forwarded by Mr. Williams to Mr. Fasone on July 19, 2011.

12. Attached hereto as Exhibit 11 is a true and correct copy of an e-mail from Mr. Williams to Mr. Fasone dated July 22, 2011.

13. Attached hereto as Exhibit 12 is a true and correct copy of e-mails between Ms. Curran and Mr. Hardt dated August 5 and 8, 2011.

14. Attached hereto as Exhibit 13 is a true and correct copy of e-mails from Mr. Fasone dated August 16 and 17, 2011.

15. Attached hereto as Exhibit 14 is a true and correct copy of an e-mail from Mr. Fasone dated August 18, 2011.

16. Attached hereto as Exhibit 15 is a true and correct copy of an e-mail from Mr. Fasone dated August 20, 2011.

17. Attached hereto as Exhibit 16 is a true and correct copy of an e-mail from Mr. Fasone dated August 22, 2011.

18. Attached hereto as Exhibit 17 is a true and correct copy of a list of proposed damages discovery.

19. Attached hereto as Exhibit 18 is a true and correct copy of an e-mail from Mr. Matuschak dated August 23, 2011.

20. Attached hereto as Exhibit 19 is a true and correct copy of a list of counter-proposed damages discovery.

21. Attached hereto as Exhibit 20 is a true and correct copy of e-mails between Mr. Williams and Ms. Curran dated August 25, 26 and 30, 2011.

22. Attached hereto as Exhibit 21 is a true and correct copy of e-mails amongst counsel for Eolas and Staples.

23. Attached hereto as Exhibit 22 is a true and correct copy of e-mails from Eolas' counsel to counsel for Staples.

24. Attached hereto as Exhibit 23 is a true and correct copy of an e-mail from Mr. Fasone dated July 23, 2011.

25. Attached hereto as Exhibit 24 is a true and correct copy of e-mails amongst counsel for Eolas and Staples dated July 26, 2011.

26. Attached hereto as Exhibit 25 is a true and correct copy of e-mails amongst counsel for Eolas and Staples.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on September 9, 2011, in Austin, Texas.



Gretchen K. Curran