

1 **KRONENBERGER BURGOYNE, LLP**

2 Henry M. Burgoyne III (CA Bar No. 203748)

3 Karl S. Kronenberger (CA Bar No. 226112)

4 Jeffrey M. Rosenfeld (CA Bar No. 222187)

5 Margarita Calpotura (CA Bar No. 244711)

6 150 Post Street, Suite 520

7 San Francisco, CA 94108

8 Telephone: (415) 955-1155

9 Facsimile: (415) 955-1158

10 hank@kronenbergerlaw.com

11 karl@kronenbergerlaw.com

12 jeff@kronenbergerlaw.com

13 margarita@kronenbergerlaw.com

14 Attorneys for Defendant, AZOOGLEADS.COM, INC

15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 **HYPERTOUCHE, INC**, a California
18 corporation,

19 Plaintiff,

20 vs.

21 **AZOOOGLE.COM, INC.**, *et al.*,

22 Defendants.

Case No. CV-08-03739 GHK

**DECLARATION OF ANWESA
PAUL IN SUPPORT OF
AZOOGLE.COM, INC.'S
RESPONSE TO ORDER TO
SHOW CAUSE**

1 I, Anwesa Paul, declare as follows:

2 1. I am an Associate General Counsel for Azoogle.com, Inc. *dba*
3 Epic Advertising, Inc. ("Azoogle"), a defendant in the above-captioned
4 action. As Associate General Counsel, I report directly to the General
5 Counsel, who exercises supervisory authority over Azoogle's legal
6 department. Unless otherwise stated, I have personal knowledge of the
7 matters stated herein.

8 2. Pursuant to this Court's Order of June 27, 2008 requesting,
9 *inter alia*, the location of current employees, Azoogle informs the Court as
10 follows:

11 a. Azoogle has fifty-six (56) employees and four (4) summer
12 interns who work out of Azoogle's New York City office;

13 b. Azoogle has three (3) employees who work out of
14 Azoogle's San Francisco office; and

15 c. Azoogle has thirty-two (32) employees who work out of
16 Azoogle's Toronto, Canada office.


17 3. Azoogle is an Internet marketing company that serves clients
18 throughout the country. As such, any state-by-state breakdown of
19 revenues and/or profits would be time consuming and burdensome, as
20 Azoogle does not maintain such data in its ordinary course of business.
21 Furthermore, such figures would be difficult to determine, since Azoogle
22 earns revenue from clients located across the country, and the source of
23 the revenue may originate from multiple locations. Moreover, the
24 disclosure of Azoogle's actual revenue numbers would result in the
25 disclosure of information that Azoogle has purposely sought to keep
26 confidential.

27 4. The clear predominance of Azoogle's assets is located in those
28

1 places in which Azoogole has employees, in rough proportion to the number
2 of employees there located. Thus, approximately 62% of Azoogole's assets
3 are held in New York, approximately 35% of Azoogole's assets are held in
4 Ontario, Canada, and a negligible percentage of Azoogole's assets are held
5 in California. Any more detailed state-by-state breakdown of Azoogole's
6 assets would be impracticable and burdensome, and would involve the
7 disclosure of Azoogole trade secrets.

8 5. Azoogole's "corporate party headquarters," as that term appears
9 in the June 27, 2008 Order of this Court, is Azoogole's New York City office.

10 I declare under penalty of perjury under the laws of the State of
11 California that the foregoing is true and correct and that this Declaration
12 was executed this 9th day of July, at New York, New York.

13
14 

15 Anwesa Paul
16
17
18
19
20
21
22
23
24
25
26
27
28