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10 UNITED STATES DISTRICT COURT  
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 ROBERT JACOBSEN, an individual, ) No. C06-1905-JSW  
14 )  
Plaintiff, )  
15 v. ) **DECLARATION OF VICTORIA K.  
HALL IN SUPPORT OF PLAINTIFF'S  
MOTION FOR RULE 11 SANCTIONS  
AND SANCTIONS UNDER THE  
16 COURT'S INHERENT POWER  
KAMIND ASSOCIATES, INC., an Oregon ) AGAINST ROBERT SCOTT JERGER  
17 corporation dba KAM Industries, )  
18 )  
Defendants. ) Courtroom: 2, 17th Floor  
19 ) Judge: Hon. Jeffrey S. White  
20 )**

21 I, VICTORIA K. HALL, hereby declare:

- 22 1. I am an attorney at law licensed to practice before all California courts and am a member of  
23 the bar of this Court. I am the attorney of record for Plaintiff in this action. I state all facts  
24 herein are of my own firsthand personal knowledge, and if called as a witness, I could and  
25 would competently testify thereto.
- 26 2. Attached hereto as Exhibit A is a true and correct copy of relevant portions related to  
27 cybersquatting from Defendants' Second Motion to Dismiss [Docket 100]. Mr. Jerger filed  
28

- 1 this motion.
- 2 3. Attached hereto as Exhibit B is a true and correct copy of relevant portions related to
- 3 cybersquatting from Plaintiff's Opposition to Defendants' Second Motion to Dismiss
- 4 [Docket 123]. Mr. Jerger would have received this Opposition through ECF.
- 5 4. Attached hereto as Exhibit C is a true and correct copy of relevant portions related to
- 6 cybersquatting from Defendants' Reply to Plaintiff's Opposition to Defendants' Second
- 7 Motion to Dismiss [Docket 127]. Mr. Jerger filed this Reply.
- 8 5. Attached hereto as Exhibit D is a true and correct copy of the entire transcript of the Jan.
- 9 19, 2007 hearing. Pages 18-21 relate to cybersquatting. Mr. Jerger received pages 18-21 as
- 10 Exhibit C in the Amended Motion for Leave to File a Second Amended Complaint, and in
- 11 the Alternative, Motion for Final Judgment Under Rule 54(b) as to Cybersquatting Cause of
- 12 Action.
- 13 6. Attached hereto as Exhibit E is a true and correct copy of Plaintiff's Motion for Leave to
- 14 File a Motion for Reconsideration [Docket 159]. Mr. Jerger would have received this
- 15 motion through ECF.
- 16 7. Attached hereto as Exhibit F is a true and correct copy of relevant portions of the Sept. 14,
- 17 2007 transcript related to the Court's requiring Plaintiff to file a motion for leave to file an
- 18 amended complaint.
- 19 8. Attached hereto as Exhibit G is a true and correct copy of an email exchange between
- 20 Victoria K. Hall, counsel for Plaintiff, and Robert Scott Jerger, counsel for Defendants,
- 21 dated mid-October 2007, regarding the proposed Second Amended Complaint. The email
- 22 shows I sent the proposed Second Amended Complaints on October 19, 2007, per this
- 23 Court's order, not October 26, 2007 as Jerger stated.
- 24 9. Attached hereto as Exhibit H is a true and correct copy of an email exchange between
- 25 Victoria K. Hall, counsel for Plaintiff, and Robert Scott Jerger, counsel for Defendants,
- 26 dated December 7, 2007, regarding Plaintiff's motion for sanctions and scheduling matters
- 27 related to the motion.

