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11	AMAZON WEB SERVICES INC., and	
12	TWITCH INTERACTIVE, INC.	
13	UNITED STATES DISTRICT COURT	
14	NORTHERN DISTRICT OF CALIFORNIA	
15	SAN JOSE DIVISION	
	5/11/1052	TVISION
16	IN RE: PERSONALWEB TECHNOLOGIES, LLC ET AL., PATENT LITIGATION,	Case No.: 5:18-md-02834-BLF
17		Case No.: 5:18-cv-00767-BLF
18	AMAZON.COM, INC., and AMAZON WEB SERVICES, INC.,	Case No. 5:18-cv-05619-BLF
19	Plaintiffs,	DECLARATION OF TODD R.
20	V.	GREGORIAN IN SUPPORT OF AMAZON'S SUPPLEMENTAL
	PERSONALWEB TECHNOLOGIES, LLC and LEVEL 3 COMMUNICATIONS, LLC,	SUBMISSION REGARDING
21	Defendants.	AMAZON'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS
22		THAT THE PERSONALWEB INVESTORS HAVE IMPROPERLY
23	PERSONALWEB TECHNOLOGIES, LLC and	WITHHELD AS PRIVILEGED
24	LEVEL 3 COMMUNICATIONS, LLC,	
25	Plaintiffs, v.	
26	TWITCH INTERACTIVE, INC.,	
27	Defendant.	
28	——————————————————————————————————————	
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I, Todd R. Gregorian, declare as follows:

- I am a partner at the law firm Fenwick & West, LLP, attorneys of record for Amazon.com, Inc., Amazon Web Services, Inc., and Twitch Interactive, Inc. (collectively "Amazon"). I make this declaration in support of Amazon's Supplemental Submission Regarding Amazon's Motion to Compel Production of Documents that the PersonalWeb Investors Have Improperly Withheld as Privileged.
- 2. Attached as Exhibit 1 is a true and correct copy of an excerpt from the OPPOSITION TO THE SPECIAL MOTIONS TO STRIKE COMPLAINT AND MOTIONS TO STRIKE PORTIONS OF COMPLAINT BY AMAZON.COM, INC., AMAZON WEB SERVICES, INC., AND TWITCH INTERACTIVE, INC., filed April 4, 2023 in Superior Court, County of Los Angeles, Civ. A No. 21VECV00575.
- 3. Attached as **Exhibit 2** is a true and correct copy of the DECLARATION OF TODD GREGORIAN IN SUPPORT OF THE OPPOSITION TO THE SPECIAL MOTIONS TO STRIKE COMPLAINT AND MOTIONS TO STRIKE PORTIONS OF COMPLAINT AMAZON.COM, INC., AMAZON WEB SERVICES, INC., AND TWITCH INTERACTIVE, INC. AND SUPPORTING EXHIBITS, filed April 4, 2023 in Superior Court, County of Los Angeles, Civ. A No. 21VECV00575.
- 4. Attached as **Exhibit 3** is a true and correct copy of a document produced by Brilliant Digital Entertainment, Inc. ("BDE") bearing Bates Nos. BDE-00064430 (designated as "Attorneys' Eyes Only").
- 5. Attached as **Exhibit 4** is a true and correct copy of a document produced by BDE bearing Bates Nos. BDE-00064453-64454 (designated as "Attorneys' Eyes Only").
- Attached as **Exhibit 5** is a true and correct copy of a document produced by Frandzel Robins Bloom & Csato L.C. ("FRBC") bearing Bates Nos. FRBC-00002384-2385 (designated as "Confidential").
- 7. Attached as **Exhibit 6** is a true and correct copy of a document produced by BDE bearing Bates Nos. BDE-000023095-23292 (designated as "Confidential").

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8.	Attached as Exhibit 7 is a true and correct copy of a document produced by BDE
bearing Bates	Nos. BDE-00023293-23312 (designated as "Confidential").

- 9. Attached as **Exhibit 8** is a true and correct copy of a document produced by BDE bearing Bates Nos. BDE-00023313-023315 (designated as "Confidential").
- 10. Attached as **Exhibit 9** is a true and correct copy of a document produced by BDE bearing Bates Nos. BDE-00023316-023332 (designated as "Confidential").
- 11. Attached as Exhibit 10 is a true and correct copy of a document produced by BDE bearing Bates Nos. BDE-00064578-064589 (designated as "Attorneys' Eyes Only").
- 12. Attached as Exhibit 11 is a true and correct copy of a document produced by BDE bearing Bates Nos. BDE-00064425-064426 (designated as "Attorneys' Eyes Only").
- 13. Attached as **Exhibit 12** is a true and correct copy of a document produced by BDE bearing Bates Nos. BDE-00064642 (designated as "Attorneys' Eyes Only").
- 14. Attached as Exhibit 13 is a true and correct copy of a document produced by BDE bearing Bates Nos. BDE-00064438-64439 (designated as "Attorneys' Eyes Only").
- 15. Attached as **Exhibit 14** is a true and correct copy of a document produced by BDE bearing Bates Nos. BDE-00064104-64105 (designated as "Attorneys' Eyes Only").
- 16. Attached as Exhibit 15 is a true and correct copy of a document produced by FRBC bearing Bates Nos. FRBC-00001619-1620 (designated as "Confidential").
- 17. Attached as **Exhibit 16** is a true and correct copy of a document produced by FRBC bearing Bates Nos. FRBC-00001621-1622 (designated as "Confidential").
- 18. Attached as Exhibit 17 is a true and correct copy of a document produced by FRBC bearing Bates Nos. FRBC-00002100-2103 (designated as "Confidential").
- 19. Attached as Exhibit 18 is a true and correct copy of a document produced by FRBC bearing Bates Nos. FRBC-00002160-2161 (designated as "Confidential").
- 20. Attached as **Exhibit 19** is a true and correct copy of a document produced by Monto Holdings Pty Ltd. bearing Bates Nos. MONTO-004132-4135 (designated as "Confidential").



I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed in San Francisco, California on this 7th day of April, 2023.

/s/Todd R. Gregorian

Todd R. Gregorian

