

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GODO KAISHA IP BRIDGE 1,)
)
 Plaintiff,)
) C.A. No. 16-290-MN
 v.)
) **JURY TRIAL DEMANDED**
 OMNIVISION TECHNOLOGIES, INC.,)
)
 Defendant.)

**DECLARATION OF LISA D. ZANG IN SUPPORT OF
DEFENDANT OMNIVISION TECHNOLOGIES, INC.’S MOTION FOR REDACTION
OF TRANSCRIPT OF DECEMBER 7, 2018 DISCOVERY TELECONFERENCE**

I, Lisa D. Zang, declare as follows:

1. I am an attorney at the law firm of Wilson Sonsini Goodrich & Rosati, P.C., counsel for Defendant OmniVision Technologies, Inc. (“Defendant” or “OmniVision”) in the above-referenced action. I submit this declaration in support of OmniVision’s Motion for Redaction of the Transcript of the December 7, 2018 Discovery Teleconference. The matters set forth herein are based upon my personal knowledge.

2. The deposition of OmniVision’s Senior Vice President of System Technologies, John Li, was taken in this case on October 17, 2018. I specified at this deposition that the entire transcript was to be treated “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.” Counsel for Plaintiff Godo Kaisha IP Bridge 1 (“Godo”) never objected to or challenged this confidentiality designation.

3. Counsel for OmniVision and Godo met and conferred regarding this motion on December 28, 2018. During the meet and confer, counsel for Godo stated that Godo opposes this motion.

4. Godo's only professed reason for opposing this motion is that there is a presumption of public access to judicial proceedings and records, and that the confidential information regarding OmniVision's business practices must be made available to the public because it was allegedly taken into account by the Court in ordering the production of summary foreign sales data.

5. Counsel for Godo also claimed during the meet and confer that the business information that OmniVision seeks to redact is not confidential. However, counsel for Godo was unable to provide even a single reason for Godo's claim that the information is not confidential to OmniVision or identify any public sources that this information could be independently derived from.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed at Los Angeles, California on January 2, 2019.

/s/ Lisa D. Zang

Lisa D. Zang

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