## **EXHIBIT 2006**



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11	Plaintiff Vasudevan Software, Inc.		
12	UNITED STATES DISTRICT COURT		
13	NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION		
14		Case No. 3:11-06637-RS-PSG	
15	VASUDEVAN SOFTWARE, INC.,	Case No. 5.11-0005/-R5-P5G	
16	Plaintiff,	DECLARATION BROOKE A.M. TAYLOR IN SUPPORT OF PLAINTIFF	
17	VS.	VASUDEVAN SOFTWARE, INC.'S	
18	MICROSTRATEGY INCORPORATED,	MOTION FOR SANCTIONS AGAINST MICROSTRATEGY	
19	Defendant.		
20			
21	I, Brooke A.M. Taylor hereby declare:		
22	1. I am an active member of the State Bar of Washington, an attorney with the firm		
23	of Susman Godfrey LLP, and admitted pro hac vice before this Court. I am one of the attorneys		
24	representing Vasudevan Software, Inc. ("VSi") in this matter. I am over the age of 18, competent		
<ul><li>25</li><li>26</li></ul>	to testify to the facts stated herein, and have personal knowledge of the facts and statements in		
27	this declaration.		
28	DECLARATION OF BROOKE A. M. TAYLOR		
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- 2. On September 4, 2012, MicroStrategy's counsel Mr. Sean Pak called me and asked to set up a meeting between MicroStrategy, VSi, and counsel for both sides. Mr. Pak stated that his client was planning to be "aggressive" in defending against VSi's claims and planned to take "initiatives" toward that end, that his client planned to file reexamination petitions with the USPTO to reexamine VSi's patents and that Mr. Pak wished to fly to Seattle to discuss these "initiatives" with VSi and its counsel.
- 3. On September 10, 2012, Mr. Pak flew to my office. Mr. Connors joined us in the conference room, and we were joined on a phone conference with my co-counsel (Les Payne, Jordan Connors, and Eric Enger), representatives of VSi (Mark and Helen Vasudevan), opposing counsel (Sean Pak), and a representative of MicroStrategy (then Executive Vice President and General Counsel, Jonathan Klein). During the call, Mr. Klein stated that MicroStrategy would not pay VSi anything to settle VSi's patent infringement claims against MicroStrategy, and threatening the following if VSi did not immediately dismiss the case:
  - a. MicroStrategy will make the litigation as painful as possible for VSi;
  - b. MicroStrategy will file reexamination petitions with the USPTO to reexamine all of VSi's patents-in-suit; and
  - c. MicroStrategy would take action against Susman Godfrey.
- 4. Regarding 3(c) above, Mr. Payne specifically asked Mr. Klein what he meant. Mr. Klein refused to answer Mr. Payne's question and suggested that we would have to wait and see.
- 5. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Signed this 20th day of November, at Seattle, Washington.

\_/s/\_Brooke A.M. Taylor Brooke A.M. Taylor

DECLARATION OF BROOKE A. M. TAYLOR

