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15 Attorneys for Plaintiff
16 N4D, LLC

17 UNITED STATES DISTRICT COURT
18 SOUTHERN DISTRICT OF CALIFORNIA

19 N4D, LLC,

20 Plaintiff,

21 vs.

22 LEGEND3D, INC. f/k/a LEGEND
23 FILMS, INC., BARRY B. SANDREW,
24 CHARLES GREGORY PASSMORE
25 a/k/a GREG PASSMORE, and BIRD
26 ROCK MULTIMEDIA, INC. d/b/a
27 PASSMORE LABS and/or Z MEDIA,

28 Defendants.

Case No. 3:13-CV-02656-BEN-NLS

**DECLARATION OF MARIO
MOORE IN SUPPORT OF
PLAINTIFF N4D, LLC'S
OPPOSITION TO
DEFENDANTS' MOTION FOR
SANCTIONS**

**Date: March 4, 2014
Time: 10:30 am
Courtroom: 5A
Judge: Hon. Roger T. Benitez**

1 I, Mario Moore, hereby declare as follows:

2 1. My name is Mario Moore. I am of counsel at Morgan, Lewis &
3 Bockius LLP, and I represent the Plaintiff N4D, LLC in this matter. The facts set
4 forth herein are within my personal knowledge based upon the documents attached
5 to this declaration.

6 2. Attached hereto as **Exhibit A** is a true and correct copy of a November
7 15, 2013 letter from Philip Dyson to Mario Moore.

8 3. Attached hereto as **Exhibit B** is a true and correct copy of a November
9 19, 2013 letter from Danna Cotman to Mario Moore.

10 4. Attached hereto as **Exhibit C** are true and correct copies of November
11 26, 2013 letters from James Glenn to Danna Cotman and Philip Dyson.

12 5. Attached hereto as **Exhibit D** are true and correct copies of the
13 December 9 and 10, 2013 letters from Danna Cotman and Philip Dyson to James
14 Glenn and Mario Moore.

15 6. Attached hereto as **Exhibit E** is a true and correct copy of a December
16 20, 2013 letter from Mario Moore to Danna Cotman.

17 7. Attached hereto as **Exhibit F** is a true and correct copy of a December
18 20, 2013 letter from Mario Moore to Philip Dyson.

19 8. Attached hereto as **Exhibit G** is a true and correct copy of Defendant
20 Passmore's Rule 11 Motion for Sanctions, dated December 20, 2013.

21 9. Attached hereto as **Exhibit H** is a true and correct copy of the
22 Defendants Legend3D, Inc. and Barry Sandrew's Rule 11 Motion for Sanctions,
23 dated December 23, 2013.

24 10. Attached hereto as **Exhibit I** is a true and correct copy of a
25 demonstrative showing Legend/Sandrew Patent Family Tree.
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CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2014, I electronically filed the following document(s) with the Clerk of the Court for the United States District Court, Southern District of California by using the CM/ECF system:

DECLARATION OF MARIO MOORE IN SUPPORT OF PLAINTIFF N4D, LLC'S OPPOSITION TO DEFENDANTS' MOTION FOR SANCTIONS

The participants listed below in the case whom are "active" registered CM/ECF users will be served by the CM/ECF system:

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I declare that I am employed by a member of the bar of this Court, at whose direction this service was made.

Dated: January 31, 2014

s/ James A. Glenn
James A. Glenn