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6 *Class Counsel*

7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN JOSE DIVISION

11 FREE RANGE CONTENT, INC., a California  
corporation, COCONUT ISLAND  
12 SOFTWARE, INC., a Hawaii corporation,  
TAYLOR CHOSE, a Minnesota resident, and  
13 MATTHEW SIMPSON, a British Columbia,  
Canada resident, on behalf of themselves and all  
14 others similarly situated,

15 Plaintiffs,

16 v.

17 GOOGLE INC, a Delaware corporation,

18 Defendant.

No. 5:14-cv-02329-BLF

DECLARATION OF URMINDER  
AULAKH

1 I, Urminder Aulakh, hereby declare as follows:

2 1. I am an attorney at law licensed to practice in the District of Columbia and  
3 Maryland. At the time that I worked on this matter, I was of counsel to Levetown & Jenkins,  
4 LLP, a California law firm. The following is based on my personal knowledge, and if called  
5 upon to testify in this matter, I could and would testify competently thereto.

6 2. I am one of the attorneys who worked on this matter on behalf of Levetown &  
7 Jenkins, LLP. I have personal knowledge of the matters set forth below, and if called as a witness  
8 I could and would testify to the following:

9 **A. My Background & Experience**

10 3. Attached hereto as Exhibit "A" is a true and correct copy of my resume.

11 **B. My Involvement in this Matter**

12 4. In April 2014, I began working with Andrew Levetown of Levetown & Jenkins,  
13 LLP, investigating the facts regarding AdSense publisher withholdings. Mikki Barry (also of  
14 counsel to Levetown & Jenkins) and I originally received a complaint from an AdSense partner  
15 who had been terminated in 2012. At Mr. Levetown's direction, I contacted this entity and its  
16 principal in April 2014 to obtain the facts about this termination. I interviewed him and  
17 reviewed documentation. I also worked with Ms. Barry and Mr. Levetown to obtain corporate  
18 information about this prospective plaintiff and ownership information about the entity involved.  
19 In addition to performing this work, I performed legal research and factual research regarding  
20 Google AdSense terminations to determine whether our original complainant's facts were  
21 common and typical of others and to determine whether others were similarly situated. I also  
22 interviewed witnesses and other publishers regarding their terminations and the reasons given by  
23 Google. Finally, I worked with Ms. Barry and Mr. Levetown to obtain and review current and  
24 prior AdSense publisher contracts, and I worked with Mr. Levetown to provide factual material  
25 to Hagens Berman for use in this matter.

26 5. We have conveyed to Hagens Berman true and correct time entries for hours that I  
27 billed on this case, together with my hourly rates at the time that I did this work. The report  
28 indicates that I billed thirty one (31) hours at a rate of \$325.00 per hour, which is my customary

1 rate billed to other clients. All of the time that I billed to this matter involved investigating the  
2 facts and the law which we conveyed to Hagens Berman for use as it saw fit in the drafting of the  
3 Complaint in this matter. If called upon, I could and would provide further detail regarding this  
4 work, which I believe to be of the sort that was reasonable and necessary.

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

7 Executed on August 3, 2018 in Bethesda, Maryland.

8   
9  
10 URMINDER AULAKH

# **Exhibit A**

U R M I N D E R S . A U L A K H

Home

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Bethesda, Maryland 20816  
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Office

AULAKH FERGUSON  
1725 I Street NW, Suite 300  
Washington, DC 20006  
202.429.9222  
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EDUCATION

BACHELOR OF SCIENCE (1984). University of Maryland, *College Park, MD. Major in business administration and minor in economics.*

MASTER OF ACCOUNTANCY (1986). *George Washington University, Washington, DC. Tracked and analyzed Japanese venture capital flows into US high-tech industries. Thesis subject: Effects of various tax reform proposals on the US real estate syndication industry.*

JURIS DOCTOR (1992). *Howard University School of Law, Washington, DC. Merit Scholar all three years.*

PROFESSIONAL EXPERIENCE

*AULAKH FERGUSON Washington, DC  
1992 to present*

Founder and partner of multi-disciplinary law firm with offices in the Washington, DC area and New York. Firm has a global clientele, and has assisted clients in cross-border trade and investment. Have assisted US companies establish and obtain USCIS approval for Regional Center investment vehicles for foreign investors seeking US immigration benefits. Have assisted US clients in international technology licensing agreements. Have assisted foreign firms in seeking and securing US technology and investment opportunities.

*GRANT THORNTON Washington, DC 20036  
1987 to 1989*

Involved in a variety of financial matters for clients across the United States, including financial audits of publicly held companies and assisting with SEC filings and litigation support.

*THE GREAT BAY COMPANY Boston, MA*

*1986 to 1987*

Assisted in structuring multi-million dollar syndication deals for commercial projects nationwide. Prepared significant portions of private placement memorandums used in raising private equity funding for the firm's deals.

#### PERSONAL BIOGRAPHY & INTERESTS

Born in India, spent formative years in London and Glasgow. Enjoy trail running, hiking and whitewater open canoeing.

#### REFERENCES

Available upon request.