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ROBERT JACOBSEN

10
11 UNITED STATES DISTRICT COURT
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 ROBERT JACOBSEN,) No. C06-1905-JSW
15)
Plaintiff,)
16 v.) **DECLARATION OF VICTORIA K.
HALL IN SUPPORT OF
ADMINISTRATIVE MOTION TO SEAL**
17 MATTHEW KATZER, et al.,)
18) Courtroom: 11, 19th Floor
Judge: Hon. Jeffrey S. White
19 Defendants.)
20)
21)
22)

23
24 I, Victoria K. Hall, have personal knowledge to the facts stated herein and hereby declare as
25 follows:

26 I am an attorney licensed in California, and I represent Robert Jacobsen, the plaintiff and
27 counter-defendants, in this action. I am submitting this Declaration in Support of the
28 Administrative Motion to Seal.

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1. Attached as Exhibit A are true correct copies of a document, Bates stamped QSI690, which was produced by QS Industries and designated Highly Confidential—Attorneys’ Eyes Only. The other document, Bates stamped KAM-2003430 to KAM-2003431, in Exhibit A was not designated as confidential.
2. Attached as Exhibit B are true and correct copies of a document, Bates stamped QSI686 by QS Industries and KAM-2003211 to KAM-2003212 by KAMIND Associates, Inc. It is designated as Highly Confidential—Attorneys’ Eyes Only by QSI. It is not designated as confidential by KAMIND Associates.
3. Attached as Exhibit C are true and correct copies of a document Bates stamped QS688 by QS Industries and KAM-00306814 by KAMIND Associates, Inc. Both QS Industries and KAMIND Associates, Inc. initially designated this document as Highly Confidential—Attorneys’ Eyes Only, but later agreed to re-designate the document as Confidential.
4. Attached as Exhibit D is a true and correct copy of a document, Bates stamped QSI683, which was produced by QS Industries. QS Industries designated this document as Highly Confidential—Attorneys’ Eyes Only.
5. Attached as Exhibit E is a true and correct copy of a document, Bates stamped QSI684-QSI685, which was produced by QS Industries. QS Industries designated this document as Highly Confidential—Attorneys’ Eyes Only.
6. Attached as Exhibit F is a true and correct copy of excerpts from a Highly Confidential-Attorney Eyes’ Only portion of the Deposition of Matthew Katzer.
7. Attached as Exhibit G is the unredacted version of Plaintiff Robert Jacobsen’s Motion for Summary Judgment.

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

Executed this 30th day of October, 2009, in Bethesda, Maryland.

By _____ /s/
Victoria K. Hall