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Attorneys for Defendants
Matthew Katzer and Kamind Associates, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ROBERT JACOBSEN, an individual,

Plaintiff,

vs.

MATTHEW KATZER, an individual, and
KAMIND ASSOCIATES, INC., an Oregon
corporation dba KAM Industries ,

Defendants.

Case Number C06-1905-JSW

DECLARATION OF R. SCOTT
JERGER IN SUPPORT OF
DEFENDANTS' MOTION FOR
SANCTIONS

I, R. Scott Jerger, declare:

1. I, R. Scott Jerger, am over the age of 18 and am competent to testify and make these averments from my own knowledge and observations. I hereby state as follows:
2. I am the attorney for Matt Katzer and KAMIND Associates, Inc.

1 3. On November 2, 2007, a served a copy of Defendants' Motion for Sanctions and a
2 draft copy of Defendants' legal memorandum in support of Defendants' Motion for Sanctions on
3 Victoria K. Hall via electronic mail to Victoria@vkhall-law.com and first class mail to Victoria
4 Hall, 3 Bethesda Metro Suite 700, Bethesda, MD, 20814.

5 4. At this time, my clients have incurred \$ 2,750.00 in attorney fees responding to
6 Plaintiff's Amended Motion for Leave to File Second Amended Complaint, and in the
7 alternative, Motion for Final Judgment under Rule 54(b) as to Cybersquatting Cause of Action
8 (the "amended motion"). I have included attorney fees incurring in reviewing the two versions
9 of the second amended complaint submitted by Plaintiff, however I have cut these fees by 50%.
10 I have included all attorney fees incurred reviewing and responding to the amended motion. I
11 have also included all time spent discussing the briefing schedule on the amended motion with
12 Plaintiff's counsel, addressing Plaintiff's scheduling motion [Dkt.#176] which is related to the
13 amended motion, reviewing Plaintiff's counsel's *ex parte* letter to this Court, discussing the
14 amended motion with my client and reviewing Plaintiff's reply.

15 5. At this time, my clients have incurred \$2,709.25 in attorney fees preparing
16 Defendants' Motion for Sanctions. This includes all correspondence with opposing counsel
17 urging opposing counsel to withdraw the second motion for reconsideration.

18
19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing is true and correct.

21
22 Executed on November 28, 2007 in Portland, Oregon.

23 _____/s/_____
24 R. Scott Jerger
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