

1 MELODY DRUMMOND HANSEN (S.B. #278786)  
mdrummondhansen@omm.com  
2 HEATHER J. MEEKER (S.B. #172148)  
hmeeker@omm.com  
3 O'MELVENY & MYERS LLP  
2765 Sand Hill Road  
4 Menlo Park, California 94025-7019  
Telephone: +1 650 473 2600  
5 Facsimile: +1 650 473 2601

6 CARA L. GAGLIANO (S.B. #308639)  
cgagliano@omm.com  
7 Two Embarcadero Center  
28th Floor  
8 San Francisco, California 94111-3823  
Telephone: +1 415 984 8700  
9 Facsimile: +1 415 984 8701

10 Attorneys for Defendant  
Bruce Perens

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12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14 **SAN FRANCISCO**

15  
16 OPEN SOURCE SECURITY, INC., and  
BRADLEY SPENGLER,

17 Plaintiffs,

18 v.

19 BRUCE PERENS, and Does 1-50,

20 Defendants.  
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Case No. 3:17-cv-04002-LB

**DECLARATION OF MELODY  
DRUMMOND HANSEN IN SUPPORT  
OF DEFENDANT BRUCE PERENS'S  
NOTICE OF MOTION AND SPECIAL  
MOTION TO STRIKE THE FIRST  
AMENDED COMPLAINT PURSUANT  
TO THE CALIFORNIA ANTI-SLAPP  
STATUTE, CODE OF CIV. PROC.  
SEC. 425.16, AND MOTION TO  
DISMISS THE FIRST AMENDED  
COMPLAINT WITH PREJUDICE  
PURSUANT TO FED. R. CIV. P.  
12(b)(6)**

Hearing Date: December 14, 2017  
Time: 9:30 a.m.  
Location: Courtroom C, 15th Floor  
Judge: Hon. Laurel Beeler

**DECLARATION OF MELODY DRUMMOND HANSEN**

I, Melody Drummond Hansen, declare as follows:

1. I am a partner of O'Melveny & Myers LLP, with an office located at 2765 Sand Hill Road, Menlo Park, CA 94025. O'Melveny is counsel for Defendant Bruce Perens ("Perens") in the above-referenced action. I am a member of the bar of the State of California. I have personal knowledge and am informed of the facts stated herein and, if called to testify, could and would testify completely hereto.

1. Attached hereto as Exhibit A is a true and correct copy of a printout of an internet forum discussion thread, available at <https://linux.slashdot.org/story/17/07/09/188246/bruceperens-warns-grsecurity-breaches-the-linux-kernels-gpl-license>, that was referred to and incorporated by reference into Plaintiff's Complaint. See ECF No. 1 ("Compl.") at ¶¶ 34, 48, 59–60, 66. Plaintiff's Complaint attached as Exhibit E a version of the discussion thread that displayed only comments posted by Mr. Perens.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this declaration was executed this 31th day of October 2017 in San Francisco, California.

By: /s/ Melody Drummond Hansen  
Melody Drummond Hansen  
Of O'Melveny & Myers LLP