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

15
16 OPEN SOURCE SECURITY, INC.,
17 Plaintiff,
18 v.
19 BRUCE PERENS, and Does 1-50,
20 Defendants.

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

**DECLARATION OF MELODY
DRUMMOND HANSEN IN SUPPORT
OF DEFENDANT OPPOSITION TO
OPEN SOURCE SECURITY, INC.'S
MOTION FOR PARTIAL SUMMARY
JUDGMENT**

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