

1 KEKER & VAN NEST LLP  
STUART L. GASNER - #164675  
2 sgasner@kvn.com  
STEVEN P. RAGLAND - #221076  
3 sragland@kvn.com  
SIMONA A. AGNOLUCCI - #246943  
4 sagnolucci@kvn.com  
633 Battery Street  
5 San Francisco, CA 94111-1809  
Telephone: 415 391 5400  
6 Facsimile: 415 397 7188

LAW OFFICES OF DORON WEINBERG  
DORON WEINBERG - #46131  
doronweinberg@aol.com  
523 Octavia Street  
San Francisco, CA 94102  
Telephone: 415 431 3472  
Facsimile: 415 552 2703

Attorneys for Defendant  
CHRISTINA HONG QIAO LIEW

7 Attorneys for Defendants WALTER LIAN-  
HEEN LIEW and USA PERFORMANCE  
8 TECHNOLOGY, INC.

MCKENNEY & FROELICH  
JEROME J. FROELICH, JR. - *pro hac vice*  
jerryfroelich@comcast.net  
Two Midtown Plaza, Suite 1250  
1349 West Peachtree Street, N.W.  
Atlanta, Georgia 30309-2920  
Telephone: 404 881 1111  
Facsimile: 404 881 8040

Attorneys for Defendant  
ROBERT MAEGERLE

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA,

17 Plaintiff,

18 v.

19 WALTER LIAN-HEEN LIEW,  
20 CHRISTINA HONG QIAO LIEW, USA  
PERFORMANCE TECHNOLOGY, INC.,  
21 and ROBERT MAEGERLE,

22 Defendants.

Case No. CR 12-0573-JSW (NC)

**DECLARATION OF JOSHUA D.  
MAREMONT IN SUPPORT OF  
DEFENDANTS' JOINT MOTION FOR  
PROTECTIVE ORDER**

Date: June 20, 2012  
Time: 11:00 a.m.  
Judge: Hon. Nathanael Cousins  
Place: Courtroom A – 15th Floor

1 I, Joshua D. Maremont, declare and state that:

2 1. I am Practice Support Coordinator at Kecker & Van Nest LLP (hereafter “KVN”)  
3 and have worked in this capacity since 1998.

4 2. In my role as Practice Support Coordinator, I oversee and provide consultation on  
5 the collection and processing of electronically stored information and its conversion for use in  
6 document databases.

7 3. Except where expressly stated, I have knowledge of the facts set forth herein, and  
8 if called to testify as a witness thereto, could do so competently under oath.

9 4. I am informed that the government intends to produce at least 13 Terabytes of  
10 discovery in this case. 13 Terabytes is the equivalent of approximately 120 shipping containers  
11 full of printed documents.

12 5. The only reasonable way for KVN to electronically house the approximately 13  
13 Terabytes of discovery in this case is on servers connected to the Internet or a network.

14 6. KVN attorneys could only access this data without a network by purchasing a  
15 massive drive array and plugging it into a standalone workstation accessible to only one person  
16 sitting in front of it. Such an undertaking probably would cost tens of thousands of dollars.

17 7. The process described in paragraph 6 above would make document review  
18 extremely inefficient, because KVN attorneys would be unable to aggregate their searches and  
19 would need to use EnCase, which is not a review tool that KVN attorneys are trained to use.

20 8. Alternatively, KVN could custom-build a review workstation with other culling  
21 and review software, but the expense of building such a workstation, purchasing licenses for the  
22 software, and managing a large volume of data on a stand-alone machine would amount to  
23 thousands, if not tens of thousands, of dollars.

24 I declare under penalty of perjury under the laws of the United States of America that the  
25 foregoing is true and correct and that this declaration was executed on May 25, 2012, at San  
26 Francisco, California.

27 /s/ Joshua D. Maremont  
28 JOSHUA D. MAREMONT