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

15 )  
16 UNITED STATES OF AMERICA, )  
17 )  
Plaintiff, )  
18 )  
v. )  
19 )  
20 WALTER LIAN-HEEN LIEW, )  
CHRISTINA HONG QIAO LIEW, USA )  
PERFORMANCE TECHNOLOGY, INC., )  
21 and ROBERT MAEGERLE, )  
22 )  
Defendants. )  
23 )

Case No. CR 11-0573-JSW (NC)

**DECLARATION OF DOCTOR AUSTIN REID, JR. IN SUPPORT OF E. I. DUPONT DE NEMOURS AND COMPANY'S OPPOSITION TO DEFENDANTS' JOINT MOTION FOR PROTECTIVE ORDER**

**Date:** June 20, 2012  
**Time:** 11:00 a.m.  
**Place:** Courtroom A – 15<sup>th</sup> Floor  
**Before:** Hon. Nathanael Cousins

24 I, Austin Reid, Jr., say:

25 1. I am a Research Fellow with E.I. du Pont de Nemours & Company (“DuPont”) and I  
26 have personal knowledge of the following facts to which I could and would testify if called as a  
27 witness.  
28

1           2. I have worked for DuPont for 26 years in its TiO<sub>2</sub> business, performing, among other  
2 things, technology and marketing functions at multiple TiO<sub>2</sub> plant sites and laboratories.  
3 Accordingly, I am familiar with DuPont's advancements in TiO<sub>2</sub> manufacturing technology, as  
4 well as the history thereof.

5           3. I am also familiar with the five trade secrets identified in the government's  
6 Superseding Indictment. While the Indictment identifies specific DuPont documents, much of  
7 the information contained in those documents also appears in multiple other DuPont confidential  
8 internal documents.

9           4. At the request of the FBI, I have personally reviewed confidential DuPont documents  
10 obtained by the United States bearing DuPont's logo or other indicia of DuPont's ownership.

11           5. I have also personally reviewed documents in the government's possession that are  
12 derived directly from DuPont's proprietary documents. For example, a table of DuPont  
13 confidential technical information was reproduced in a third-party document I reviewed.

14           6. Pursuant to my position as Research Fellow, I am extremely knowledgeable regarding  
15 the TiO<sub>2</sub> manufacturing industry. There are relatively few individuals who would be considered  
16 industry experts and almost all of these individuals work for either DuPont or one of its  
17 competitors.

18           7. Based on my long involvement in this industry, I know of, and in many cases have  
19 met, the major players. However, before becoming aware of the acts giving rise to this action  
20 and the related civil action, I had never heard of Walter Liew or his company USAPTI. To the  
21 best of my knowledge, Mr. Liew had never developed technology for DuPont or any of the other  
22 companies that use a chloride-route TiO<sub>2</sub> manufacturing process. Furthermore, I have searched  
23 the patents associated with the chloride-route TiO<sub>2</sub> manufacturing process and Mr. Liew is not  
24 listed as an inventor on any of these patents.

25 I declare under penalty of perjury under the laws of the United States of America that the  
26 foregoing is true and correct. Executed this 6th day of June, 2012 in Pass Christian, Mississippi.

27   
28 Austin Reid, Jr.