

1 BLANK ROME LLP
Colleen A. Carolan (SBN 210755)
2 Carolan@BlankRome.com
Howard M. Knee (55048)
3 Knee@BlankRome.com
1925 Century Park East, 19th Floor
4 Los Angeles, CA 90067
Telephone: 424.239.3400
5 Facsimile: 424.239.3434
6 Attorneys for Defendant
REMBRANDT IP SOLUTIONS, LLC
7

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10

11 PHILIP C. HARTSTEIN,

12 Plaintiff,

13 vs.

14 REMBRANDT IP SOLUTIONS, LLC, and DOES
1 through 25, Inclusive ,

15 Defendants.
16
17
18

Case No. 3:12-cv-02270-SC

*[Assigned To Honorable Samuel Conti,
Courtroom 1]*

**DECLARATION OF DEREK WOOD IN
SUPPORT OF REMBRANDT IP
SOLUTIONS, LLC'S RESPONSE TO
ORDER TO SHOW CAUSE**

19 **DECLARATION OF DEREK WOOD**
20

21 I, Derek Wood, hereby declare as follows:

22 1. I am Corporate Counsel and Secretary for Rembrandt IP Management, LLC
23 ("RIPM"), the parent company of Defendant Rembrandt IP Solutions, LLC ("RIPS"). I have held
24 this position since 2005. I also serve as Secretary of RIPS, a position I have held since 2009.

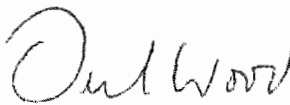
25 2. As a result of my positions, I have detailed knowledge of RIPM's and RIPS's
26 corporate organization and operations, including matters relating to their respective members and the
27 citizenship of those members.
28

1 4. RIPM is the sole member of RIPS. RIPM is a limited liability company established
2 under the laws of the State of Delaware, with a principal place of business in the Commonwealth of
3 Pennsylvania.

4 5. RIPM also has only one member. The sole member of RIPM is an individual who
5 resides in and is a citizen of the Commonwealth of Pennsylvania.

6
7 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements
8 are true and correct to the best of my knowledge and belief.

9
10 Dated: May 29, 2012



Derek Wood