

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SOFTWARE FREEDOM
CONSERVANCY, INC. and ERIK
ANDERSEN,

Plaintiffs,

v.

BEST BUY CO., INC.; SAMSUNG
ELECTRONICS AMERICA, INC.;
WESTINGHOUSE DIGITAL
ELECTRONICS, LLC; JVC AMERICAS
CORPORATION; WESTERN DIGITAL
TECHNOLOGIES, INC.; ROBERT
BOSCH LLC; PHOEBE MICRO, INC.;
HUMAX USA INC.; COMTREND
CORPORATION; DOBBS-STANDFORD
CORPORATION; VERSA
TECHNOLOGY INC.; and GCI
TECHNOLOGIES CORPORATION,

Defendants.

Civil Action No: 09-cv-10155 (SAS)
Judge Scheindlin

DECLARATION OF TERRI
POINDEXTER IN SUPPORT OF
RESPONDENT WESTINGHOUSE
DIGITAL, LLC'S OPPOSITION TO
PLAINTIFFS' MOTION TO FIND
WESTINGHOUSE DIGITAL, LLC IN
CONTEMPT

I, Terri Poindexter, declare as follows:

1. I am currently in charge of Human Resources for Westinghouse Digital, LLC ("WD").

2. In April 2010 WD acquired from Credit Managers Association of California doing business as Credit Management Association ("CMA"), certain business records of Mora Electronics, LLC ("Mora"). Included in these records is documentation showing that all of Mora's employees on April 2, 2010 had their respective positions and employment terminated as of that date.

3. None of WD's employees has been an employee of Mora at any time following the termination of employment on April 2, 2010 to the present.

4. I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 9, 2011 in Orange, California.

/s/ Terri Bondey