

Honorable Thomas S. Zilly

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

VENICE PI, LLC,
Plaintiff,
v.
SEAN O’LEARY JR., et al.
Defendants.

Civil Action No. 17-cv-988TSZ

VENICE PI, LLC,
Plaintiff,
v.
JONATHAN DUTCZAK, et al.
Defendants.

Civil Action No. 17-cv-990TSZ

VENICE PI, LLC,
Plaintiff,
v.
MARTIN RAWLS, et al.
Defendants.

Civil Action No. 17-cv-991TSZ

VENICE PI, LLC,
Plaintiff,
v.
INA SICOTORSCHI, et al.
Defendants.

Civil Action No. 17-cv-1074TSZ

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VENICE PI, LLC,
Plaintiff,
v.
GREGORY SCOTT, et al.
Defendants.

Civil Action No. 17-cv-1075TSZ

VENICE PI, LLC,
Plaintiff,
v.
YELENA TKACHENKO, et al.
Defendants.

Civil Action No. 17-cv-1076TSZ

VENICE PI, LLC,
Plaintiff,
v.
CELINA POTTER, et al.
Defendants.

Civil Action No. 17-cv-1160TSZ

VENICE PI, LLC,
Plaintiff,
v.
TONJA LAIBLE, et al.
Defendants.

Civil Action No. 17-cv-1163TSZ

VENICE PI, LLC,
Plaintiff,
v.
VICTOR TADURAN, et al.
Defendants.

Civil Action No. 17-cv-1164TSZ

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VENICE PI, LLC,
Plaintiff,
v.
JESSE COOPER, et al.
Defendants.

Civil Action No. 17-cv-1211TSZ

VENICE PI, LLC,
Plaintiff,
v.
JASMINE PATTERSON, et al.
Defendants.

Civil Action No. 17-cv-1219TSZ

VENICE PI, LLC,
Plaintiff,
v.
DAVID MEINERT, et al.
Defendants.

Civil Action No. 17-cv-1403TSZ

DECLARATION OF PATRICK ACHACHE

DECLARATION OF PATRICK ACHACHE

I, Patrick Achache, declare as follows:

1. My name is Patrick Achache.
2. I am over the age of 18 and am otherwise competent to make this declaration. This declaration is based on my personal knowledge and, if called upon to do so, I will testify that the facts stated herein are true and accurate.
3. I am willing to travel to the State of Washington and appear before Your Honor to answer any questions and to discuss the statements in this declaration.
4. I have made significant efforts to locate Darren M. Griffin, or otherwise confirm that he is a "real person" who (1) worked briefly for Crystal Bay Corporation in the 2012-2013 to verify data licensed from Excipio; and (2) verified infringement detection data and submitted a number of declarations in various jurisdictions confirming the data. However, I have been unable to locate Mr. Griffin. Notwithstanding the foregoing, I confirm that Darren M. Griffin is a real person and in fact performed the work attributed to him as noted above.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

EXECUTED the 18 day of April, 2018.



Patrick Achache

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served to all counsel or parties of record who are deemed to have consented to electronic service via the Court’s CM/ECF system.

s/ David A. Lowe