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12 Attorneys for Defendants  
13 AT&T CORP. and AT&T INC.

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

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18 TASH HEPTING, GREGORY HICKS,  
CAROLYN JEWEL and ERIK KNUTZEN  
19 on Behalf of Themselves and All Others  
Similarly Situated,  
20  
Plaintiffs,  
21  
vs.  
22 AT&T CORP., AT&T INC. and DOES 1-20,  
23 inclusive,  
24 Defendants.  
25

No. C-06-0672-VRW

**DECLARATION OF BRUCE A.  
ERICSON IN SUPPORT OF  
MOTION OF DEFENDANT AT&T  
CORP. TO FILE UNDER SEAL  
DEFENDANT AT&T CORP.'S  
MEMORANDUM IN SUPPORT OF  
FILING DOCUMENTS UNDER  
SEAL [DKT. 30-32]**

**[Civ. L.R. 7-11, 79-5]**

Courtroom: 6, 17th Floor  
Judge: Hon. Vaughn R. Walker

Filed concurrently:  
1. Motion to File Memo Under Seal  
2. Proposed Order

28

1 I, **BRUCE A. ERICSON**, declare as follows:

2 1. I am an attorney licensed to practice law in the State of California and  
3 admitted to practice before this Court, and am a partner of the law firm of Pillsbury  
4 Winthrop Shaw Pittman LLP, counsel for defendant **AT&T CORP.** (“AT&T”) and also for  
5 specially appearing defendant **AT&T INC.**, which is not a party to this motion. Except for  
6 those matters stated on information and belief, which I believe to be true, I have personal  
7 knowledge of the facts stated herein and, if called as a witness, I could and would  
8 competently testify thereto.

9 2. Defendant AT&T Corp.’s Memorandum in Support of Filing Documents  
10 Under Seal [Dkt. 30-32] (the “Confidential Memorandum”) contains detailed discussion of  
11 certain confidential documents (the “Confidential Documents”) of which AT&T seeks  
12 return, and of the declaration of James W. Russell (filed under seal, *see* Dkt. 42,  
13 “Confidential Russell Declaration”), which itself analyzes the Confidential Documents and  
14 the impact publicly filing them would have on AT&T and its customers.

15 3. The Confidential Documents contain detailed non-public information about  
16 critical communications infrastructure operated by AT&T.

17 4. I am informed and believe that AT&T considers the information in the  
18 Confidential Documents highly confidential and proprietary, and such information has  
19 value generally unknown to the public or AT&T’s competitors.

20 5. I am informed and believe that AT&T is careful to preserve the  
21 confidentiality of information contained in the Confidential Documents, and public  
22 disclosure of the information contained in the Confidential Documents would endanger  
23 AT&T’s ability to provide services and carry out its business activities. Exposure to the  
24 threats that would arise from disclosure of the Confidential Documents would harm AT&T  
25 and its customers.

26 6. The Confidential Memorandum describes the contents of the Confidential  
27 Documents and the Confidential Russell Memorandum in great detail. Putting them into  
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1 the public record of this Court would injure AT&T in the same way that publicly filing the  
2 Confidential Documents would.

3 I declare under penalty of perjury under the laws of the State of California and the  
4 United States that the foregoing is true and correct.

5 Executed this 12<sup>th</sup> day of April, 2006, at San Francisco, California.

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/s/ Bruce A. Ericson  
Bruce A. Ericson