

**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 JAY R. CAMPBELL**

I, Jay R. Campbell, declare as follows:

1. I am a member of the State Bar of Ohio and am a partner of the law firm Renner, Otto, Boisselle & Sklar LLP.

2. On April 2, 2010 Westinghouse Digital Electronics, LLC (“Westinghouse”) executed a General Assignment for the benefit of its creditors in favor of the Credit Management Association (“the CMA”), under which a Delaware limited liability company, formerly known as Golden Star Electronics, LLC (“Golden Star”) purchased the assets of Westinghouse.

3. Through this transaction, Golden Star acquired the licensing rights to use the Westinghouse name, which has a long-standing history in the television market. Golden Star subsequently changed its name from Golden Star Electronics, LLC to Westinghouse Digital, LLC (“the Company”) to utilize this asset. The entity originally known as Westinghouse Digital Electronics is now known as Mora Electronics, LLC (“Mora”).

4. Attached hereto as Exhibit A is a true and accurate copy of an April 28, 2010 bulletin to Westinghouse’s creditors from Michael Joncich of the CMA, notifying creditors of the April 2, 2010 General Assignment for the benefit of creditors and providing creditors with a Proof of Claim form to file with the CMA in order to participate in disbursement of funds generated to unsecured creditors from the liquidation of Mora.

5. I was informed on May 3, 2010 by Mr. Joncich that the CMA would not be defending the above captioned case. Further, Mr. Joncich terminated our services and revoked authority to act on behalf of Westinghouse. Attached as Exhibit B is a true and accurate copy of an email confirming such communications between Mr. Joncich and me. The CMA’s contact information is:

Credit Management Association  
c/o Michael L. Joncich  
Manager, Adjustment Bureau  
40 East Verdugo Avenue  
Burbank, California 91502  
mjoncich@creditservices.org

6. I have conferred with Daniel B. Ravicher, counsel for the Software Freedom Conservancy, Inc. et al. (“the Conservancy”), regarding the withdrawal of trial and local counsel from representation. Mr. Ravicher expressed that the Conservancy would not oppose the motion to withdraw if Westinghouse agreed to entry of a default judgment. Attached as Exhibit C is a

true and accurate copy of an email from counsel substantiating these communications. Because services of trial and local counsel have been terminated, we have no authority and are unable to agree to an entry of default judgment. However, as discussed above, it is our understanding that CMA does not intend to defend the above-captioned case.

Executed on June 29, 2010 in Cleveland, Ohio.

/s/ Jay R. Campbell  
Jay R. Campbell