1 2	JACK P. DICANIO (SBN 138782) jack.dicanio@skadden.com ALLEN RUBY (SBN 47109)	
3 4 5	allen.ruby@skadden.com SKADDEN, ARPS, SLATE, MEAGHER & FLO 525 University Avenue, Suite 1400 Palo Alto, California 94301 Telephone: (650) 470-4500 Facsimile: (650) 470-4570	OM LLP
6 7 8 9 10	BARRY SIMON (pro hac vice forthcoming) bsimon@wc.com JONATHAN B. PITT (pro hac vice forthcoming jpitt@wc.com STEPHEN L. WOHLGEMUTH (pro hac vice for swohlgemuth@wc.com WILLIAMS & CONNOLLY LLP 725 Twelfth Street, N.W. Washington, D.C. 20005 Telephone: (202) 434-5000 Facsimile: (202) 434-5029	,
12 13 14	MARC L. ABRAMOWITZ UNITED STATES DISTRICT COURT	
15	NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION	
	I SAN HRANCI	SCADIDIVISION
16	BAIVERAIVE	SCO DIVISION
	In re Ex Parte Application of	CASE NO.: 3:18-mc-80132-JSC
16 17 18		CASE NO.: 3:18-mc-80132-JSC DECLARATION OF STEPHEN L. WOHLGEMUTH IN SUPPORT OF
17	In re Ex Parte Application of PALANTIR TECHNOLOGIES INC., Applicant, For an Order Pursuant to 28 U.S.C. § 1782 to Obtain Discovery from MARC L.	CASE NO.: 3:18-mc-80132-JSC DECLARATION OF STEPHEN L.
17 18 19	In re Ex Parte Application of PALANTIR TECHNOLOGIES INC., Applicant, For an Order Pursuant to 28 U.S.C. § 1782 to	CASE NO.: 3:18-mc-80132-JSC DECLARATION OF STEPHEN L. WOHLGEMUTH IN SUPPORT OF MARC L. ABRAMOWITZ'S
17 18 19 20	In re Ex Parte Application of PALANTIR TECHNOLOGIES INC., Applicant, For an Order Pursuant to 28 U.S.C. § 1782 to Obtain Discovery from MARC L. ABRAMOWITZ for Use in Foreign	CASE NO.: 3:18-mc-80132-JSC DECLARATION OF STEPHEN L. WOHLGEMUTH IN SUPPORT OF MARC L. ABRAMOWITZ'S
17 18 19 20 21	In re Ex Parte Application of PALANTIR TECHNOLOGIES INC., Applicant, For an Order Pursuant to 28 U.S.C. § 1782 to Obtain Discovery from MARC L. ABRAMOWITZ for Use in Foreign	CASE NO.: 3:18-mc-80132-JSC DECLARATION OF STEPHEN L. WOHLGEMUTH IN SUPPORT OF MARC L. ABRAMOWITZ'S
117 118 119 220 221 222	In re Ex Parte Application of PALANTIR TECHNOLOGIES INC., Applicant, For an Order Pursuant to 28 U.S.C. § 1782 to Obtain Discovery from MARC L. ABRAMOWITZ for Use in Foreign	CASE NO.: 3:18-mc-80132-JSC DECLARATION OF STEPHEN L. WOHLGEMUTH IN SUPPORT OF MARC L. ABRAMOWITZ'S
17 18 19 20 21 22 23	In re Ex Parte Application of PALANTIR TECHNOLOGIES INC., Applicant, For an Order Pursuant to 28 U.S.C. § 1782 to Obtain Discovery from MARC L. ABRAMOWITZ for Use in Foreign	CASE NO.: 3:18-mc-80132-JSC DECLARATION OF STEPHEN L. WOHLGEMUTH IN SUPPORT OF MARC L. ABRAMOWITZ'S
17 18 19 20 21 22 23 24	In re Ex Parte Application of PALANTIR TECHNOLOGIES INC., Applicant, For an Order Pursuant to 28 U.S.C. § 1782 to Obtain Discovery from MARC L. ABRAMOWITZ for Use in Foreign	CASE NO.: 3:18-mc-80132-JSC DECLARATION OF STEPHEN L. WOHLGEMUTH IN SUPPORT OF MARC L. ABRAMOWITZ'S
17 18 19 20 21 22 23 24 25	In re Ex Parte Application of PALANTIR TECHNOLOGIES INC., Applicant, For an Order Pursuant to 28 U.S.C. § 1782 to Obtain Discovery from MARC L. ABRAMOWITZ for Use in Foreign	CASE NO.: 3:18-mc-80132-JSC DECLARATION OF STEPHEN L. WOHLGEMUTH IN SUPPORT OF MARC L. ABRAMOWITZ'S

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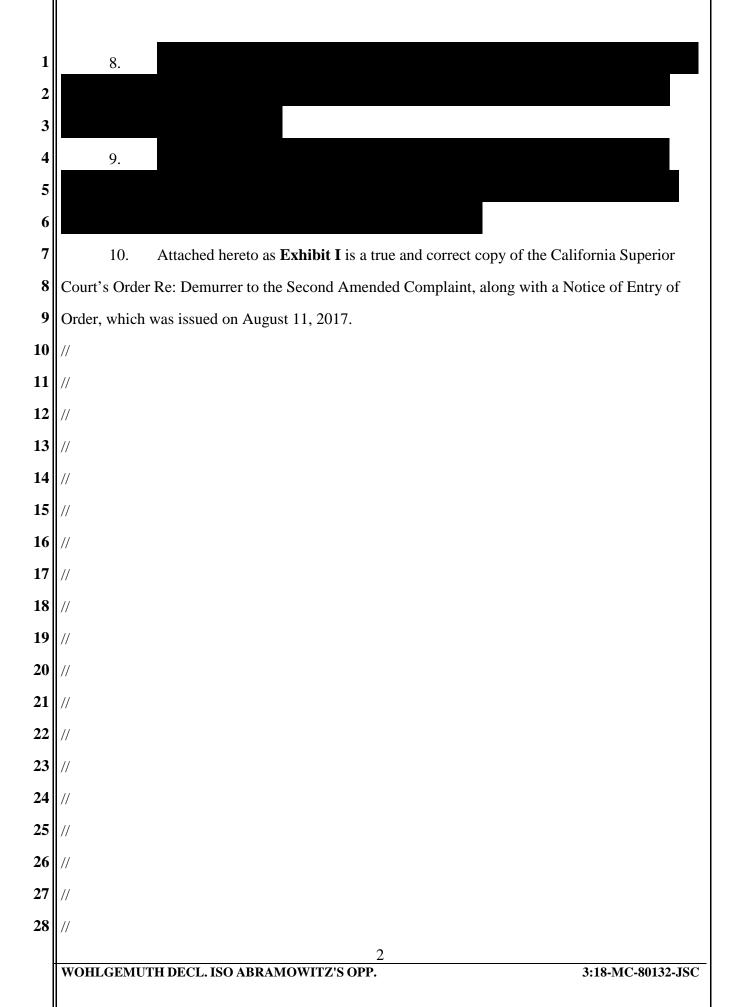
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- I, Stephen L. Wohlgemuth, hereby declare as follows:
- I am an attorney at the law firm of Williams & Connolly LLP, which is counsel of 3 | record (pro hac vice forthcoming) for Marc L. Abramowitz ("Abramowitz") in the above-4 captioned matter. I make this declaration based on my own personal knowledge, and if called upon to do so, could and would testify competently thereto.
- 2. On May 5, 2017, Palantir Technologies Inc. ("Palantir") filed a second amended complaint ("SAC") against Abramowitz, the Marc Abramowitz Charitable Trust No. 2, and KT4 8 | Partners LLC ("KT4") in the Superior Court of the State of California for the County of Santa 9 Clara (Case No. 16-cv-299476) (the "California Action"). Attached hereto as **Exhibit A** is a true 10 and correct copy of the SAC.
- 3. On February 13, 2018, the parties to the California Action appeared at a hearing 12 before Judge Mary E. Arand. Attached hereto as **Exhibit B** is a true and correct copy of the transcript of the February 13, 2018 proceedings.
- 4. On September 4, 2018, the California Superior Court in the California Action 15 entered an Order Continuing the Stay of Discovery in the California Action. Attached hereto as **16** Exhibit C is a true and correct copy of the Notice of Entry of Order and the court's Order.
 - 5. On July 16, 2018, KT4 filed a brief filed with the Delaware Supreme Court. Attached hereto as **Exhibit D** is a true and correct excerpt from KT4's Delaware Supreme Court brief.
 - 6. On October 20, 2015, Abramowitz filed an international application with the World Intellectual Property Organization for "Dynamic Security Rating for Cyber Insurance Products." Attached hereto as **Exhibit E** is a true and correct copy of that application.
- 7. On October 20, 2015, Abramowitz filed a patent application with the United States **24** Patent and Trademark Office for "Dynamic Security Rating for Cyber Insurance Products" (the "U.S. application"). Attached hereto as **Exhibit F** is a true and correct copy of Abramowitz's U.S. **26** application.



Case 3:18-mc-80132-JSC Document 16-6 Filed 09/07/18 Page 4 of 4

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

Executed on September 7, 2018 in Washington, DC.

Stephen L. Wohlgemuth