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16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**
WESTERN DIVISION

18 FLO & EDDIE, INC., a California
19 corporation, individually and on behalf
of all others similarly situated,

20 Plaintiff,

21 v.

22 SIRIUS XM RADIO, INC., a Delaware
23 corporation; and DOES 1 through 10,

24 Defendants.

Case No. CV13-05693 PSG (GJSx)

**DECLARATION OF KALPANA
SRINIVASAN IN SUPPORT OF
REPLY IN SUPPORT OF
PLAINTIFF FLO & EDDIE, INC.’S
MOTION IN LIMINE TO
PRECLUDE TESTIMONY OF DR.
KEITH R. UGONE [MIL 11 of 13]**

1 I, Kalpana Srinivasan, hereby declare and state as follows:

2 1. I am a member in good standing of the bar of this Court, an active
3 member of the State Bar of California, a partner in the law firm of Susman Godfrey
4 L.L.P. and counsel of record for the plaintiff in the above-captioned action. I have
5 personal knowledge of the facts set forth herein, and if called as a witness, would
6 testify competently thereto.

7 2. I make this declaration in support of Reply In Support Of Plaintiff Flo &
8 Eddie, Inc.'s Motion In Limine To Preclude Testimony Of Dr. Keith R. Ugone
9 [MIL 11 of 13].

10 3. Attached as Exhibit A is a true and correct copy of a CONFIDENTIAL
11 email dated August 31, 2016 from Sirius XM Counsel Jennifer LaGrange.

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

15 Signed this 21st day of October, 2016, at Los Angeles, California.

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17 /s/ Kalpana Srinivasan
18 Kalpana Srinivasan

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