

# Exhibit D

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11 Attorneys for Plaintiff

12 BARCO N.V.

13 **UNITED STATES DISTRICT COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**  
15 **SAN JOSE DIVISION**

16 **BARCO N.V., a Belgian corporation**  
17 **Plaintiff,**  
18 **v.**  
19 **TECHNOLOGY PROPERTIES LTD.,**  
20 **PATRIOT SCIENTIFIC CORP., and**  
21 **ALLIACENSE LTD.,**  
22 **Defendants.**  
23  
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Case No. **C 08 05398 JF**

**DECLARATION OF TOD L.  
GAMLEN IN SUPPORT OF BAKER &  
McKENZIE'S RESPONSE TO  
CHARLES H. MOORE'S MOTION TO  
DISQUALIFY**

**DECLARATION OF TOD L. GAMLEN**

I, Tod L. Gamlen, declare as follows:

1. I am a principal of the firm of Baker & McKenzie, and I work in the firm's Palo Alto office. I am a member of the bar of the State of California. I am personally familiar with the facts stated in this declaration.
2. I knew Susan Nycum when she worked at Baker & McKenzie, in the Palo Alto office, prior to her retirement in 2001. I understood her practice to focus on counseling technology companies. To my knowledge she did not do patent prosecution or patent litigation.
3. Prior to being shown this motion, I had never heard of Charles H. ("Chuck") Moore or Computer Cowboys. I have never done any work for or had any contact with Charles H. Moore or Computer Cowboys.
4. I do not know if Ms. Nycum ever represented Computer Cowboys or Mr. Moore or the subject matter of any representation by Ms. Nycum of Computer Cowboys or Mr. Moore.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 3rd day of February, 2011, in Palo Alto, California..



Tod L. Gamlen