

# **EXHIBIT 1**

1 CHHABRA LAW FIRM, PC  
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7 **Attorney for Plaintiffs**  
8 Open Source Security Inc. and  
9 Bradley Spengler

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12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14 **SAN FRANCISCO DIVISION**  
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16 OPEN SOURCE SECURITY INC. and ) Case No.: 3:17-cv-04002-LB  
17 BRADLEY SPENGLER )  
18 Plaintiffs, ) **Declaration of Rohit Chhabra in Support of**  
19 v. ) **OSS' Opposition to Perens' Attorneys' Fee**  
20 BRUCE PERENS, and Does 1-50, ) **Motion**  
21 Defendants. ) Location: Courtroom C, 15th Floor  
22 Judge: Hon. Laurel Beeler  
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**Declaration of Rohit Chhabra**

I, Rohit Chhabra, declare:

1. I am the attorney of record for Plaintiffs Open Source Security Inc. (OSS) and Bradley Spengler in the above-referenced action, and I am admitted to practice before this Court. I have personal knowledge of the facts stated herein and, if called to testify, I could and would testify completely hereto.

2. I colloquially sent an email to Ms. Hansen stating, “Oh interesting. This would be a fun game to play. If you win this, I’ll happily pay your bills,” intending to mean that I accept her anti-SLAPP motion as a challenge. This statement did not mean anything else.

3. I clarified the above to Ms. Hansen on December 26, 2017. I also clarified that my colloquy was intentionally being misrepresented.

4. In my professional judgment the complaint had to be amended to withstand an anti-SLAPP motion. I amended the complaint only reduce costs to both parties and promote judicial economy.

5. Had I known Defendant would have filed an anti-SLAPP motion, I would have amended the complaint prior to Defendant’s first anti-SLAPP motion.

6. I did not argue the motion for summary judgment since the Court had already made its decision; continue to argue the motion would have been disrespectful.

7. Exhibit 2 is a true and correct copy of the sanction entries of Defendant’s timekeeping records.

I declare under penalty of perjury under the laws of the United States that the foregoing is

1 true and correct.

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3 Executed this 8th day of March 2018 in Mountain View, California.

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6 */s/ Rohit Chhabra* \_\_\_\_\_  
7 Rohit Chhabra

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# **EXHIBIT 2**

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