

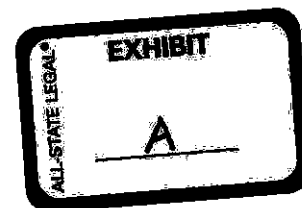
UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

| | | | |
|---------------------------|------------|---|---------------------------------|
| _____ | |) | |
| GENERAL ELECTRIC COMPANY, | |) | |
| | Plaintiff, |) | |
| | |) | |
| v. | |) | Civil Action No. 08-591-CMH/JFA |
| | |) | |
| ADRIANA KOECK, | |) | |
| | Defendant. |) | |
| _____ | |) | |

**DECLARATION OF SARAH E. BOUCHARD IN SUPPORT OF
GENERAL ELECTRIC COMPANY'S
OPPOSITION TO ADRIANA KOECK'S MOTION TO DISMISS**

Sarah E. Bouchard declares:

1. I have personal knowledge of the facts stated herein, and am competent to testify thereto.
2. I make this Declaration in support of Plaintiff General Electric Company's ("GE") Memorandum in Opposition to the Motion to Dismiss filed by Defendant Adriana Koeck ("Ms. Koeck") in the above-captioned action.
3. I am a partner at the law firm of Morgan, Lewis & Bockius LLP in its Philadelphia, Pennsylvania office.
4. As stated in GE's pleadings, on March 17, 2008, GE was notified that protected information was provided to a reporter, David Kay Johnson, who was then affiliated with the *New York Times*.
5. From March 17, 2008, through April 10, 2008, when the *New York Times* informed GE that they would not publish Mr. Johnston's article, attorneys with the law firm of



Morgan, Lewis & Bockius LLP incurred fees totaling approximately \$194,000.00 in connection with identifying the documents and information that Ms. Koeck retained and/or disclosed, addressing inquiries from Mr. Johnston to GE about the information and documents that Ms. Koeck provided to him, and addressing Ms. Koeck's improper retention and disclosures of GE's protected information.¹

6. Additionally, between March 17, 2008 and June 6, 2008, when GE filed this action against Ms. Koeck, attorneys with the law firm of Morgan, Lewis & Bockius LLP incurred fees totaling approximately \$15,000.00 in connection with communicating with Ms. Koeck and her attorneys about her improper retention and disclosure of GE's protected information.

7. GE also retained Curtis Rose, the Founder and Managing Member of Curtis W. Rose & Associates LLC, as a computer forensics consultant to examine and analyze the contents of several hard drives in connection with GE's efforts to identify the protected information that Ms. Koeck retained and/or improperly disclosed. To date, Mr. Rose has incurred fees totaling \$39,875.00.

8. I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: 7-8-08



SARAH E. BOUCHARD, ESQ.

¹ This total does not reflect the fees and costs incurred by Morgan, Lewis & Bockius LLP in connection with its filings and court appearances in this action. This total also does not include the fees and costs incurred by GE's in-house attorneys to date. However, GE reserves the right to seek reimbursement for these additional external and internal fees and costs.