

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE INITIAL PUBLIC OFFERING  
SECURITIES LITIGATION

This Document Relates To:  
ALL CASES

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Civil Action No. 21 MC 92 (SAS)

**FOCUS CASE PLAINTIFFS'  
PSLRA DECLARATIONS**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE INITIAL PUBLIC OFFERING SECURITIES  
LITIGATION

21 MC 92 (SAS)

**DECLARATION OF SASWATA BASU**

I, **SASWATA BASU**, declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I have personal knowledge of the matters stated herein.
2. I am a proposed settlement class representative in Lante Corp., Neoforma, Onvia.com, Ventro Corp., Corvis, Avenue A.
3. I am a proposed class representative in Lante Corp., Neoforma, Onvia.com, Ventro Corp., Corvis, Avenue A.
4. I am a Lead Plaintiff in Lante Corp., Neoforma, Corvis, Avenue A.
5. I submit this declaration in support of my application for a compensatory award in consideration of my services and responsibilities as a representative party in this case.
6. I have monitored the progress of the case from the outset. I have been in regular contact with the Executive Committee of Plaintiffs' Counsel throughout the litigation both to discuss the factual allegations, legal issues and case strategy. I have called counsel on occasion and was in regular contact with various attorneys and/or legal assistants at the law firm of Bernstein Liebhard LLP throughout the eight years of this litigation.
7. Among other things, I reviewed drafts of pleadings, pleadings, discovery requests and various status letters sent to me by my counsel in order to keep myself informed of the events in this litigation and to act in the interests of the Class. I have also searched for and

produced documents relating to my own transactions during the class period and completed and executed a detailed questionnaire that was produced to defendants.

8. I have kept track of my time being involved in this litigation and have expended approximately 1200 hours on this case since its inception in 2001. Had I not been working on this litigation, the time I spent would have otherwise been directly devoted to my employment as an entrepreneur and therefore amounts to foregone income and opportunities. During the course of this litigation, my maximum compensation level, measured on an hourly basis was \$500 per hour. As a result, I respectfully request reimbursement for \$600,000 to be paid out of the Settlement Fund upon the settlement being approved.

9. I have not been provided or promised any consideration or benefit, directly or indirectly, other than as may be provided for in the plan of allocation of the class settlement benefits approved by the Court or as reimbursement explicitly ordered by the Court of my reasonable costs and expenses (including lost wages) directly relating to my representation of the Class. Apart from compensation for my losses resulting from purchases of the IPO securities as provided in the Settlement, or pursuant to this application for reimbursement of my costs and expenses, I will not be paid, directly or indirectly, any money for participating in this lawsuit.

10. At all times during this litigation, I have taken my obligations as a representative party seriously and have been committed to performing my duties in a manner that benefits the best interests of the Class.

11. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13 day of Aug, 2009.



Saswata Basu

**Exhibit 2**

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE INITIAL PUBLIC OFFERING SECURITIES  
LITIGATION

21 MC 92 (SAS)

**DECLARATION OF DEBORAH BELCORE**

I, Deborah Belcore, declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I have personal knowledge of the matters stated herein.
2. I am a proposed settlement class representative in the following actions:
  - Critical Path, Inc. 01 Civ. 6542
  - E.piphany, Inc. 01 Civ. 6158
  - SciQuest.com, Inc. 01 Civ. 7415
  - Sycamore Networks, Inc. 01 Civ. 6001
  - Ventro Corp. 01 Civ. 3450
  - Viador, Inc./01 Civ. 10040
  - Vitria Technology, Inc./01 Civ. 10092
3. I am a proposed class representative in the following actions:
  - Critical Path, Inc. 01 Civ. 6542
  - E.piphany, Inc. 01 Civ. 6158
  - SciQuest.com, Inc. 01 Civ. 7415
  - Sycamore Networks, Inc. 01 Civ. 6001
  - Ventro Corp. 01 Civ. 3450
  - Viador, Inc./01 Civ. 10040
  - Vitria Technology, Inc./01 Civ. 10092

4. I am a Lead Plaintiff in the following actions:

5. I submit this declaration in support of my application for a compensatory award in consideration of my services and responsibilities as a representative party in this case.

6. I have monitored the progress of the case from the outset. I have been in regular contact with the Executive Committee of Plaintiffs' Counsel throughout the litigation both to discuss the factual allegations, legal issues and case strategy. I have called counsel on occasion and was in regular contact with various attorneys and/or legal assistants at the law firms of Cauley Bowman Carney & Williams, PLLC and Carney Williams Bates Bozeman & Pulliam, PLLC throughout the eight years of this litigation.

7. Among other things, I reviewed drafts of pleadings, pleadings, discovery requests and various status letters sent to me by my counsel in order to keep myself informed of the events in this litigation and to act in the interests of the Class. I have also searched for and produced documents relating to my own transactions during the class period and completed and executed a detailed questionnaire that was produced to defendants.

8. As I served as a representative party in a focus case in this Litigation, I also prepared for, traveled to and sat for a deposition. I also prepared and consulted with my attorneys and/or legal assistants regarding my Answers and Objections to Defendants' Interrogatories.

9. I have kept track of my time being involved in this litigation and have expended approximately 130 hours on this case since its inception in 2001. Although I was not working during the course of the litigation, I respectfully request that I be

reimbursed for my time and expense at a standard amount of \$25 per hour for the hours I spent on this litigation, which could have been spent pursuing other opportunities. As a result, I respectfully request reimbursement for \$3,250 to be paid out of the Settlement Fund upon the settlement being approved.

10. I have not been provided or promised any consideration or benefit, directly or indirectly, other than as may be provided for in the plan of allocation of the class settlement benefits approved by the Court or as reimbursement explicitly ordered by the Court of my reasonable costs and expenses (including lost wages) directly relating to my representation of the Class. Apart from compensation for my losses resulting from purchases of the IPO securities as provided in the Settlement, or pursuant to this application for reimbursement of my costs and expenses, I will not be paid, directly or indirectly, any money for participating in this lawsuit.

11. At all times during this litigation, I have taken my obligations as a representative party seriously and have been committed to performing my duties in a manner that benefits the best interests of the Class.

12. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 27 day of July, 2009

By: Deborah Belcore  
Deborah Belcore

Exhibit 3

**DECLARATION OF ANITA BUDICH**

I, Anita Budich, declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I have personal knowledge of the matters stated herein.

I am a proposed settlement class representative and proposed class representative in the VA Linux Systems action.

2. I submit this declaration in support of my application for a compensatory award in consideration of my services and responsibilities as a representative party in this case.

3. I have monitored the progress of the case from the outset. I have been in regular contact with the Executive Committee of Plaintiffs' Counsel throughout the litigation both to discuss the factual allegations, legal issues and case strategy. I have called counsel on occasion and was in regular contact with various attorneys and/or legal assistants at the law firm of Wolf Haldenstein Adler Freeman & Herz LLP throughout the eight years of this litigation.

4. Among other things, I reviewed drafts of pleadings, discovery requests and various status letters sent to me by my counsel in order to keep myself informed of the events in this litigation and to act in the interests of the Class. I have also searched for and produced documents relating to my own transactions during the class period and completed and executed a detailed questionnaire that was produced to defendants.

5. As I served as a representative party in a focus case in this Litigation, I also prepared for, traveled to and sat for a deposition. I also prepared and consulted with my attorneys and/or legal assistants regarding my Answers and Objections to Defendants' Interrogatories.

6. I have kept track of my time being involved in this litigation and have expended approximately 123 hours on this case since its inception in 2001. Had I not been working on this litigation, the time I spent would have otherwise been directly devoted to my employment as an Associate Real Estate Broker and therefore amounts to foregone income and opportunities. During the course of this litigation, my maximum compensation level, measured on an hourly basis, was \$87.50 per hour. As a result, I respectfully request reimbursement for \$10,762.50 to be paid out of the Settlement Fund upon the settlement being approved.

7. I have not been provided or promised any consideration or benefit, directly or indirectly, other than as may be provided for in the plan of allocation of the class settlement benefits approved by the Court or as reimbursement explicitly ordered by the Court of my reasonable costs and expenses (including lost wages) directly relating to my representation of the Class. Apart from compensation for my losses resulting from purchases of the IPO securities as provided in the Settlement, or pursuant to this application for reimbursement of my costs and expenses, I will not be paid, directly or indirectly, any money for participating in this lawsuit.

8. At all times during this litigation, I have taken my obligations as a representative party seriously and have been committed to performing my duties in a manner that benefits the best interests of the Class.

9. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6 day of July, 2009.

By:   
Anita Budich

**Exhibit 4**

**DECLARATION OF LINDA CALDWELL**

I, Linda Caldwell, declare, pursuant to 28 U.S.C. § 1746, as follows:

13. I have personal knowledge of the matters stated herein.

14. I am a proposed settlement class representative in the following actions:

Aspect Medical Systems, Inc.

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15. I am a proposed class representative in the following actions:

Aspect Medical Systems, Inc.

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16. I am a Lead Plaintiff in the following actions:

N/A

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17. I submit this declaration in support of my application for a compensatory award in consideration of my services and responsibilities as a representative party in this case.

18. I have monitored the progress of the case from the outset. I have been in regular contact with the Executive Committee of Plaintiffs' Counsel throughout the litigation both to discuss the factual allegations, legal issues and case strategy. I have called counsel on occasion and was in regular contact with various attorneys and/or legal assistants at the law firm of Barroway Topaz Kessler Meltzer Check LLP throughout the eight years of this litigation.

19. Among other things, I reviewed drafts of pleadings, pleadings, discovery requests and various status letters sent to me by my counsel in order to keep myself informed of the

events in this litigation and to act in the interests of the Class. I have also searched for and produced documents relating to my own transactions during the class period and completed and executed a detailed questionnaire that was produced to defendants.

20. As I served as a representative party in a focus case in this Litigation, I also prepared for, traveled to and sat for a deposition. I also prepared and consulted with my attorneys and/or legal assistants regarding my Answers and Objections to Defendants' Interrogatories.

21. I have kept track of my time being involved in this litigation and have expended approximately 75 hours on this case since its inception in 2001. Although I was not working during the course of the litigation, I respectfully request that I be reimbursed for my time and expense at a standard amount of \$20 per hour for the hours I spent on this litigation, which could have been spent pursuing other opportunities. As a result, I respectfully request reimbursement for \$1,500 to be paid out of the Settlement Fund.

22. I have not been provided or promised any consideration or benefit, directly or indirectly, other than as may be provided for in the plan of allocation of the class settlement benefits approved by the Court or as reimbursement explicitly ordered by the Court of my reasonable costs and expenses (including lost wages) directly relating to my representation of the Class. Apart from compensation for my losses resulting from purchases of the IPO securities as provided in the Settlement, or pursuant to this application for reimbursement of my costs and expenses, I will not be paid, directly or indirectly, any money for participating in this lawsuit.

23. At all times during this litigation, I have taken my obligations as a representative party seriously and have been committed to performing my duties in a manner that benefits the best interests of the Class.

24. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 26 day of June, 2009.

By: Linda Caldwell  
**Linda Caldwell**

**Exhibit 5**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE INITIAL PUBLIC OFFERING SECURITIES  
LITIGATION

21 MC 92 (SAS)

**DECLARATION OF DIANE COLLINS**

I, Diane Collins, declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I have personal knowledge of the matters stated herein.
2. I am a proposed settlement class representative in the following actions:

Firepond, Inc.

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3. I am a proposed class representative in the following actions:

Firepond, Inc.

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4. I am a Lead Plaintiff in the following actions:

N/A

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5. I submit this declaration in support of my application for a compensatory award in consideration of my services and responsibilities as a representative party in this case.

6. I have monitored the progress of the case from the outset. I have been in regular contact with the Executive Committee of Plaintiffs' Counsel throughout the litigation both to discuss the factual allegations, legal issues and case strategy. I have called counsel on occasion and was in regular contact with various attorneys and/or legal assistants at the law firm of Barroway Topaz Kessler Meltzer Check LLP throughout the eight years of this litigation.

7. Among other things, I reviewed drafts of pleadings, pleadings, discovery requests and various status letters sent to me by my counsel in order to keep myself informed of the

events in this litigation and to act in the interests of the Class. I have also searched for and produced documents relating to my own transactions during the class period and completed and executed a detailed questionnaire that was produced to defendants.

8. As I served as a representative party in a focus case in this Litigation, I also prepared for, traveled to and sat for a deposition. I also prepared and consulted with my attorneys and/or legal assistants regarding my Answers and Objections to Defendants' Interrogatories.

9. I have kept track of my time being involved in this litigation and have expended approximately 100 hours on this case since its inception in 2001. Had I not been working on this litigation, the time I spent would have otherwise been directly devoted to my employment as VP - Collins Consulting Services and Edward Jones and therefore amounts to foregone income and opportunities. During the course of this litigation, my maximum compensation level, measured on an hourly basis was \$25 per hour. As a result, I respectfully request reimbursement for \$2,500 to be paid out of the Settlement Fund upon the settlement being approved.

10. I have not been provided or promised any consideration or benefit, directly or indirectly, other than as may be provided for in the plan of allocation of the class settlement benefits approved by the Court or as reimbursement explicitly ordered by the Court of my reasonable costs and expenses (including lost wages) directly relating to my representation of the Class. Apart from compensation for my losses resulting from purchases of the IPO securities as provided in the Settlement, or pursuant to this application for reimbursement of my costs and expenses, I will not be paid, directly or indirectly, any money for participating in this lawsuit.

11. At all times during this litigation, I have taken my obligations as a representative party seriously and have been committed to performing my duties in a manner that benefits the best interests of the Class.

12. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 29th day of June, 2009.

By: Diane Collins  
**Diane Collins**

**Exhibit 6**

