Mike Bettinger (SBN 122196)
mbettinger@sidley.com
Philip W. Woo (SBN 196459)
pwoo@sidley.com
Holly Hogan (SBN 238714)
hhogan@sidley.com
SIDLEY AUSTIN LLP
555 California Street, Suite 2000
San Francisco, California 94104
Telephone: (415) 772-1200
Facsimile: (415) 772-7400

Attorneys for Defendant
Amazon.com, Inc.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SMARTDATA S.A., Plaintiff, vs. AMAZON.COM, INC., Defendant.	Case No. 3:15-cv-01282-SI Assigned To: The Hon. Susan Illston **DECLARATION OF MICHAEL J. BETTINGER IN SUPPORT OF AMAZON.COM, INC.'S NOTICE OF MOTION AND MOTION FOR ATTORNEY FEES** Date: November 20, 2015 Time: 9:00 a.m. Place: Courtroom 10, 19th Floor

I, Michael J. Bettinger, hereby declare as follows:

1. I am an attorney at the law firm of Sidley Austin LLP and am counsel for Defendant Amazon.com ("Amazon") in the above-captioned matter. I have personal knowledge of the facts set forth below. If called upon, I could and would testify competently hereto.

2. Sidley Austin LLP prepares and submits invoices to the client on a monthly basis. The invoices provide a detailed description, on a daily basis, of the tasks performed by each legal professional and the amount of time billed. Disbursements incurred on behalf of the Client are itemized on each invoice.

3. Time records are maintained on a daily basis by timekeepers utilizing a time billing system called Intapp Time.

4. I have reviewed the monthly billing statements for *SmartData S.A. v. Amazon.com, Inc.*, Case No. 3:15-cv-01282-SI and provide the following monthly invoice summary of fees billed:

Attorneys' Fees

Sidley Austin LLP Summary of Attorneys' Fees by Month	
Invoice Month	**Invoice Monthly Total**
September 2015 (for Fees Incurred in August 2015)	$73,129.30
To be billed October 2015[1] (for fees Incurred in September 2015)	$43,273.30
Total	$116,302.60
Amount requested by Amazon (80% of Total)	**93,122.08**

5. Attached hereto as Exhibit A is a detailed summary of legal fees billed by month including timekeeper, job title and qualification of timekeeper, hourly rate, brief monthly summary of work performed, numbers of hours billed for that month and the total billed by that timekeeper by month.

[1] This includes time for the period September 1 through September 18, 2015.

6. An abstract of the legal billings, copies of the legal billings and/or the contemporary time records can be made available to the Court for an in camera inspection should the Court deem that appropriate pursuant to Local Rule 54-5(b)(2).

8. Attached hereto as Exhibit B is a true and correct copy of a webpage from the website Crunchbase, relating to MVI Finance, Ltd., which SmartData identified as owning more than 10% of SmartData (Docket No. 25). This webpage was printed from: https://www.crunchbase.com/organization/mvi-finance#/entity (last visited September 30, 2015).

9. Attached hereto as Exhibit C is a true and correct copy of the current firm biographies of the Sidley Austin LLP attorneys listed in Exhibit A.

10. Attached hereto as Exhibit D is a true and correct copy of excerpts from the American Intellectual Property Law Association 2015 Report of the Economic Survey.

11. Attached hereto as Exhibit E is a true and correct copy of the Transcript of Proceedings on September 18, 2015.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this second day of October 2015 at San Francisco, California.

/s/ Michael J. Bettinger
Michael J. Bettinger