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10 Attorneys for Defendant
REUVEN HASAK

11
12 **IN THE UNITED STATES DISTRICT COURT**
13 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
14 **SOUTHERN DIVISION**

15
16 ECHOSTAR SATELLITE CORP.,
ECHOSTAR COMMUNICATIONS
17 CORP., ECHOSTAR TECHNOLOGIES
CORP., AND NAGRASTAR L.L.C.,

18 Plaintiffs,

19 v.

20 NDS GROUP PLC, NDS AMERICAS,
INC., JOHN NORRIS, REUVEN
21 HASAK, OLIVER KOMMERLING,
JOHN LUYANDO, PLAMEN DONEV,
22 VESSELINE NEDELTCHEV,
CHRISTOPHER TARNOVSKY, ALLEN
23 MENARD, LINDA WILSON, MERVIN
MAIN, DAVE DAWSON, SHAWN
24 QUINN, ANDRE SERGEI, TODD
DALE, STANLEY FROST, GEORGE
25 TARNOVSKY, BRIAN
SOMMERFIELD, ED BRUCE,
26 "BEAVIS," "JAZZERCZ,"
"STUNTGUY," and JOHN
27 DOES 1 - 100.

28 Defendants.

Case No. SA CV 03-950 DOC(JTLX)

**DECLARATION OF R. HASAK IN
SUPPORT OF DEFENDANT R.
HASAK'S MOTION TO DISMISS
PLAINTIFFS' THIRD AMENDED
COMPLAINT**

Date: December 13, 2004

Time: 8:30 a.m.

Dept: Judge David Carter
Courtroom 9D

1 **DECLARATION OF REUVEN HASAK**

2 I, Reuven Hasak, hereby declare and state as follows:

3 1. I am one of the defendants in the above captioned case. The matters
4 stated herein are true and correct and are within my personal knowledge, and, if called
5 upon to testify as a witness, I could and would testify competently thereto. I make this
6 Declaration in support of my Motion to Dismiss Plaintiffs' Third Amended Complaint.

7 2. I have read plaintiffs' Third Amended Complaint and understand that
8 plaintiffs in this case seek to force me to appear in California and defend myself against
9 numerous claims being asserted by plaintiffs.

10 3. I have not consented to jurisdiction in the United States.

11 4. I am a resident of Tel Aviv, Israel, where I have lived for my entire
12 life. I have never been a resident of the United States.

13 5. I do not own any property in California, or anywhere in the United
14 States.

15 6. I am a Director and Partner of Shafran Ltd., an Israeli Company that
16 provides security consulting services to its customers, including NDS Group PLC. NDS
17 Group PLC is headquartered in the United Kingdom.

18 7. The services provided by Shafran to its customers include
19 performing security audits, protective security consulting, and economic
20 investigations. As part of my work with Shafran, I work as a subcontractor for NDS
21 Group PLC as its Vice-President for Worldwide Operational Security.

22 8. I do not have any employees or agents in California or anywhere in
23 the United States.

24 9. I do not maintain an office in California or anywhere in the United
25 States.

26 10. I visit the United States approximately five to seven times per year
27 for business and personal reasons. These visits are primarily to New York, NY to meet
28 with NDS and News Corporation personnel. Approximately once a year I visit San

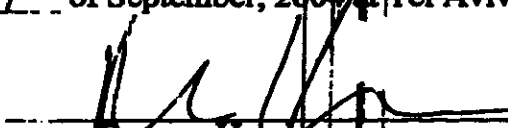
1 Francisco with my wife for a medical visit to my wife's doctor. Infrequently and
2 irregularly, I will travel to Newport Beach, CA, to meet with NDS personnel.

3 12. Aside from my work on behalf of Shafran, I do not solicit or transact
4 any business in California or anywhere in the United States .

5 13. If I am forced to appear in California and defend myself against the
6 numerous claims being asserted against me by plaintiffs, it will result in substantial
7 inconvenience to me, including time away from my family and time away from my
8 responsibilities at Shafran as a result of needing to take numerous trips from Israel to
9 attend proceedings in this case and to meet with my attorneys.

10 14. Furthermore, I am volunteer reservist in the Israeli armed forces. If I
11 am forced to appear in California and defend myself in this action, this will prevent me
12 from fulfilling my military obligations and duties.

13
14 I declare under penalty of perjury that the foregoing is true and correct and
15 that this declaration was executed on the 17 of September, 2004 at Tel Aviv, Israel.

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18 
19 Reuven Hasak

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