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25 PINSCREEN, INC. and DR. HAO LI

26 SUPERIOR COURT OF THE STATE OF CALIFORNIA
27 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

28 DR. IMAN SADEGHI, an individual,
29
30 Plaintiff,
31
32 v.
33 PINSCREEN, INC., a Delaware Corporation;
34 DR. HAO LI, an individual; and DOES 1-100,
35
36 Defendants.

Case No. BC709376

**DECLARATION OF DR. HAO LI IN
SUPPORT OF PINSCREEN'S MOTION
FOR FILING DOCUMENTS UNDER
SEAL**

Date: Sept. 17, 2021
Time: 9:00 a.m.
Dept.: 16

RSVP ID: 363061509625

Assigned for All Purposes to:
Hon. Lia Martin, Dept. 16

Action Filed: June 11, 2018
Trial Date: March 14, 2022

I, Dr. Hao Li, declare as follows:

1. I am the Chief Executive Officer and co-Founder of Defendant Pinscreen, Inc. I have personal knowledge of the facts contained in this declaration, except for those matters stated upon

1 information and belief. If called upon to testify, I would and could testify competently as to the
2 truth of the facts stated herein.

3 2. Pinscreen was founded by me in September 2015 and I have been Pinscreen’s CEO
4 from its founding until the present. My expertise is in Computer Graphics, Computer Vision, and
5 Applied Machine Learning. My research specializes on digitizing humans and capturing their facial
6 expressions and movement.

7 3. The technology developed by Pinscreen is designed to create a lifelike three-
8 dimensional computer-generated character from a two dimensional image, such as a photograph.
9 Pinscreen’s goal is to make the creation of increasingly photorealistic digital humans accessible to
10 consumers for video games, movies, fashion retail, virtual reality and other applications.

11 4. In order for Pinscreen’s business to operate, it must maintain the confidentiality of
12 its algorithms, inventions, financing and trade secrets. The information in the following objections
13 in Pinscreen’s Objections to Evidence Submitted in Support of Plaintiff’s Opposition to Motion for
14 Summary Judgment/Summary Adjudication, which if revealed to a competitor, could be damaging
15 to Pinscreen’s viability: Objections 8, 17 and 35 to Plaintiff’s Additional Material Facts. Based on
16 information and belief, there is no benefit for the general public to have this proprietary information.

17 5. Additionally, the information and evidence submitted by Plaintiff in Opposition to
18 the Summary Judgment Motion regarding the USC Investigation is confidential. This investigation
19 has been a very taxing and embarrassing matter for me and its publicity only harms my reputation.
20 Based on information and belief, there is no value in having this investigation known to the general
21 public. The following objections in Pinscreen’s Objections to Evidence Submitted in Support of
22 Plaintiff’s Opposition to Motion for Summary Judgment/Summary Adjudication contain
23 information regarding the USC investigation, and other personnel issues: Objections 24, 26-28 and
24 47 to Sadeghi’s Declaration; Objection 4 to Zaffos’s Declaration; and Objections 32-39 and 42 to
25 Plaintiff’s Additional Material Facts.

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I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct. Executed on July 10, 2021 in Santa Monica , California.



Dr. Hao Li