

DSC COMMUNICATIONS CORPORATION,

Plaintiff,

v.

EVAN BROWN,

Defendant.

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IN THE DISTRICT COURT OF

COLLIN COUNTY, TEXAS

219TH JUDICIAL DISTRICT

**AFFIDAVIT OF MATT BILBO**

STATE OF TEXAS §  
                                  §  
COUNTY OF DALLAS §

BEFORE ME, the undersigned authority, on this day personally appeared Matt Bilbo, who, being by me duly sworn, on his oath stated as follows:

1. My name is Matt Bilbo. I am over the age of 18 years, have never been convicted of a felony or a crime involving moral turpitude, and am competent to make this Affidavit. The matters and facts stated herein are within my personal knowledge and are true and correct.
2. I first became employed by DSC in 1988, and have been continuously employed by DSC since that time. I am currently employed by DSC as a senior manager in software development. During my employment with DSC, I worked with Evan Brown for several years. Initially, Mr. Brown was my supervisor, but through a series of promotions and reassignments, I eventually became Mr. Brown's manager. Because of the fact that we worked together for several years, I became familiar with the type of work in which Mr. Brown was involved.
3. During the time that Brown was employed by DSC, DSC exposed Mr. Brown to information that DSC considers to be confidential and proprietary. Such information included, but was not limited to, (i) the manner in which DSC's compilers, assembler, and linkers are customized

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for DSC, (ii) the techniques used by DSC to customize these software tools, (iii) the status of various projects on which he was working, and (iv) knowledge of certain contracts that DSC had with some of its customers. In my experience as an employee of DSC, DSC treats this type of information as confidential, and does not share such information with persons who are not employees of DSC.

FURTHER, AFFIANT SAITH NOT.

  
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Matt Bilbo, Affiant

SWORN TO AND SUBSCRIBED BEFORE ME by the said Matt Bilbo, on this 28th day of July, 1997.

[Seal]

  
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Notary Public in and for the State of Texas

