

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

IN RE MICROSOFT CORP.
ANTITRUST LITIGATION

This Document Relates to:
Novell, Inc. v. Microsoft Corporation,
Civil Action No. JFM-05-1087

MDL Docket No. 1332
Hon. J. Frederick Motz

AFFIDAVIT OF BEAU H. HOLT

STATE OF WASHINGTON)
 : ss.:
COUNTY OF KING)

BEAU H. HOLT, being duly sworn, deposes and says:

1. I am a member of the bar of the State of Washington and a lawyer at the law firm of K&L Gates LLP. I submit this declaration in connection with Microsoft's Memorandum in Opposition to Novell's Motion to Compel Answers to Interrogatories, dated April 22, 2009.

2. I work in the e-Discovery Analysis and Technology (e-DAT) Group at K&L Gates LLP. The e-DAT Group maintains an electronic repository of documents produced by Microsoft Corporation ("Microsoft") in various lawsuits, including the documents produced to plaintiffs in *Comes v. Microsoft Corp.*, No. CL 82311 (Polk County, Iowa).

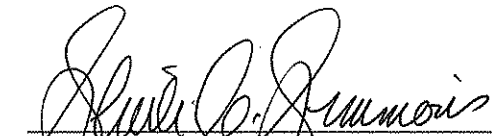
3. I often work with lawyers at Sullivan & Cromwell LLP, counsel for Microsoft in the above-captioned action, to identify documents relevant to this action within the collection of documents produced to the *Comes* plaintiffs.

4. Microsoft does not maintain all of the documents produced to the *Comes* plaintiffs in a single database.

5. Because the documents produced to the *Comes* plaintiffs exist in many different databases, it is not possible to submit a single query and find documents that contain particular search terms.


Beau H. Holt

Subscribed to and sworn to before
me this 22nd day of April, 2009.


Notary Public

