

STATE OF WISCONSIN, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 ABBOTT LABORATORIES, INC., et. al., )  
 )  
 Defendants. )

Case No.: 04 CV 1709

**SUPPLEMENTAL AFFIDAVIT OF MATTHEW RAY**

STATE OF CALIFORNIA )

) ss.

COUNTY OF KERN )

Matthew Ray, being duly sworn, deposes and states:

1. My name is Matthew Ray. As I informed the Court in my affidavit of September 14, 2007, I own and operate MC Consulting, GroupWiseGuru.com and specialize in the extraction, search and review of e-mail produced, transmitted and stored in a software product known as GroupWise. My qualifications and professional experience are set forth in greater detail in my first affidavit.
2. I submit this affidavit to further explain to the Court my knowledge of the GroupWise email system and to clarify the basis for the opinions that I offered in my first affidavit.

**Installation and Maintenance of the GroupWise E-mail System**

3. GroupWise is a sophisticated and complex email software system and, as a result, in my experience, GroupWise customers typically employ competent information

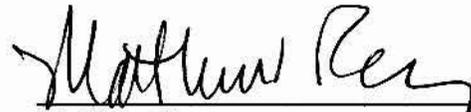
technology professionals to install, maintain and enhance the GroupWise email system.

4. From time to time, email systems encounter computing problems and may even stop working altogether, commonly referred to as the system “crashing” or freezing.” On such occasions, competent information technology professionals are required to intervene to fix the problem and restore the system to working order.

**GroupWise Architecture is Consistent**

5. I have worked with hundreds of companies that use the GroupWise email system. My experience is that GroupWise’s internal software architecture – how GroupWise works – does not significantly vary from customer to customer.
6. In essence, the GroupWise software works in basically the same way on the various computer systems on which it is installed.
7. While I do not need to confer with Plaintiff’s I.T. personnel to learn about how the State has configured its GroupWise email system to provide the Court with an estimate of the time and cost of an email collection, as a practical matter such information would make it easier and more economical for me to collect GroupWise email.

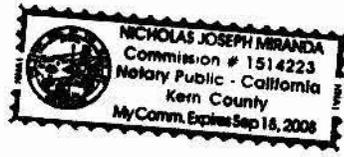
The above statements are true to the best of my knowledge and belief.

  
Matthew Ray

Sworn to and subscribed before me this

22<sup>nd</sup> day of October, 2007.

  
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**Notary Public**

My Commission Expires: Sept. 18<sup>th</sup>, 2008