

SCHIFF HARDIN LLP
JOHN S. WORDEN (SBN 142943)
Email: jworden@schiffhardin.com
JEAN-PAUL P. CART (SBN 267516)
Email: jcart@schiffhardin.com
JAMIE LYNN LANPHEAR (SBN 302174)
Email: jlanphear@schiffhardin.com
One Market, Spear Street Tower
Thirty-Second Floor
San Francisco, CA 94105
Telephone: (415) 901-8700
Facsimile: (415) 901-8701

Attorneys for Defendant
Aqua Lung America, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

RALPH A. HUNTZINGER, on
Behalf of Himself and All Others
Similarly Situated,

Plaintiff,

v.

AQUA LUNG AMERICA, INC.,

Defendant.

Case No. 3:15-cv-01146 WQH (KSC)

CLASS ACTION

**DECLARATION OF MIKA HOLAPPA
IN SUPPORT OF DEFENDANT'S
MOTION TO DISMISS**

Hearing Date: August 17, 2015

**NO ORAL ARGUMENT UNLESS
REQUESTED BY THE COURT**

Complaint filed: May 21, 2015

Judge: Hon. William Q. Hayes

Magistrate Judge: Hon. Karen S. Crawford

Trial Date: None Set

I, Mika Holappa, hereby declare that the following is true and correct under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I currently hold the position of Business Unit Director, Diving for Suunto Oy ("Suunto"), and have since 2011. I am responsible for overseeing Suunto Dive Business unit strategy, sales, marketing and product development. I have been employed by Suunto since 2006 and have held various roles involving the sales and marketing of Suunto dive products.

1 2. Suunto is the manufacturer of the following dive computers: Suunto
2 Cobra, Suunto Cobra 2, Suunto Cobra 3, Suunto Cobra 3 Black, Suunto Vyper,
3 Suunto Vyper 2, Suunto Vyper Air, Suunto HelO2, Suunto Gekko, Suunto Vyttec,
4 Suunto Vyttec DS, Suunto D9tx, Suunto D9, Suunto D6, Suunto D6i, Suunto D4i,
5 Suunto D4, and Suunto Zoop ("Accused Dive Computers").

6 3. Attached hereto as Exhibit 1 is a true and accurate set of photographs
7 of each of the Accused Dive Computers.


8 4. Attached hereto as Exhibit 2 is a true and accurate chart that lists the
9 differences in hardware and software among each of the Accused Dive Computers.

10 5. Attached hereto as Exhibit 3 is a true and accurate chart that lists the
11 end of production or manufacturing, or continuing manufacture for each of the
12 Accused Dive Computers.

13 6. Attached hereto as Exhibit 4 is a true and accurate chart that lists the
14 differences in features among each of the Accused Dive Computers.

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16 I declare the foregoing is true and correct to the best of my knowledge,
17 information, and belief.

18 Executed on July 2nd, 2015 at Vantaa, Finland.

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21 Mika Holappa, Business Unit Director, Diving
22 Suunto Oy
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