

WILLKIE FARR & GALLAGHER LLP

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Attorney for Petitioner

Oto Analytics, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

OTO ANALYTICS, LLC,

Petitioner,

v.

BENWORTH CAPITAL PARTNERS LLC,

Respondent.

Case No. 3:24-cv-03975-AMO

**DECLARATION OF ALEXANDER L.
CHENEY IN SUPPORT OF
PETITIONER'S REPLY IN SUPPORT OF
MOTION TO CONFIRM ARBITRATION
AWARD AND FOR ENTRY OF
JUDGMENT**

1 I, Alexander L. Cheney, pursuant to 28 U.S.C. § 1746, declare as follows:

2 1. I am a member in good standing of the bars of California and New York. I am
3 admitted to practice in the United States District Court for the Northern District of California. I
4 am a partner at Willkie Farr & Gallagher LLP, counsel for Petitioner Oto Analytics, LLC (f/k/a
5 Oto Analytics, Inc. d/b/a Womply) (“Womply”).

6 2. I respectfully submit this declaration to provide this Court with documents cited in
7 Womply’s Reply in Support of the Motion to Confirm the Arbitration Award and for Entry of
8 Judgment, as permitted by Local Civil Rule 7-3(c). This declaration is based on my personal
9 knowledge or information provided to me.

10 3. A true and correct copy of excerpts from the transcript of the closing arguments
11 presented during the hearing dated June 29, 2023 is attached hereto as **Exhibit 1**.

12 4. A true and correct copy of Benworth’s Motion to Disqualify William M. Manger,
13 Jr., as Womply’s Expert Witness, dated January 25, 2023 is attached hereto as **Exhibit 2**.

14 5. A true and correct copy of Womply’s Opposition to Benworth’s Motion to Stay the
15 Arbitration, dated September 14, 2023 is attached hereto as **Exhibit 3**.

16
17 I declare under the penalty of perjury under the laws of the State of California and the United
18 States that the foregoing is true and correct.

19
20 Executed at San Francisco, California on this 13 day of September, 2024.

21 Dated: September 13, 2024

WILLKIE FARR & GALLAGHER LLP

22 By: /s/ Alexander L. Cheney

23 Alexander L. Cheney

24 *Attorney for Petitioner*
25 *Oto Analytics, LLC*