

**DeCONCINI McDONALD
YETWIN & LACY, P.C.**

2525 East Broadway, Suite 200
Tucson, Arizona 85716-5300
Telephone: 520-322-5000
Facsimile: 520-322-5585

LISA ANNE SMITH, AZ Bar No. 016762
(lsmith@dmyl.com)

SHEFALI MILCZAREK-DESAI, AZ Bar No. 021237
(smdesai@dmyl.com)

PERKINS COIE LLP

101 Jefferson Drive
Menlo Park, California 94025-1114
Telephone: (650) 838-4300
Facsimile: (650) 838-4350

(*admitted pro hac vice*)

LISA KOBIALKA, CA Bar No. 191404
(lkobialka@perkinscoie.com)

ESHA BANDYOPADHYAY, CA Bar No. 212249
(ebandyopadhyay@perkinscoie.com)

SEAN BOYLE, CA Bar No. 238128
(sboyle@perkinscoie.com)

Attorneys for Plaintiff
THE FREECYCLE NETWORK, INC.

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

THE FREECYCLE NETWORK, INC.,
an Arizona non-profit organization,

Plaintiff,

v.

TIM OEY and JANE DOE OEY,

Defendants.

CASE NO. 06-CV-00173-RCC

DECLARATION OF DERON BEAL IN
SUPPORT OF THE FREECYCLE
NETWORK, INC.'S REPLY TO
DEFENDANTS' OPPOSITION TO MOTION
FOR PRELIMINARY INJUNCTION

Date: May 9, 2006
Time: 3:00 p.m.
Before: Honorable Raner C. Collins
Location: Courtroom 5B

I, Deron Beal, declare as follows:

1. I am the founder, Executive Director and Board Chair of The Freecycle Network, Inc. ("The Freecycle Network"). I make this declaration in support of The Freecycle Network's Reply to Defendants' Opposition to Motion for Preliminary Injunction. I have personal

knowledge of the facts stated and if called to testify as a witness, would competently testify thereto.

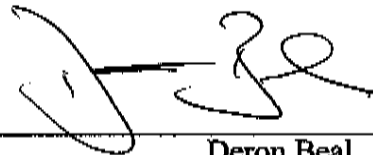
2. The Freecycle Network, Inc. is a nonprofit corporation incorporated under the laws of the State of Arizona. The Freecycle Network encourages and helps to coordinate the efforts of member groups throughout the world to reuse, recycle, and gift goods. The organization was started in Tucson, Arizona, with a single recycling group and the Web site. Today, The Freecycle Network is a worldwide organization, with thousands of local recycling groups and more than an estimated two million individual members. Publications such as CNN.com, The Motley Fool, CBS News, and The Washington Post have heavily praised The Freecycle Network and its promotion of the reusing, recycling, and gifting of goods.

3. The overwhelming majority of the first fifty (50) results of a search for the term "Freecycle" using the Internet search engine Google™ ("Google") refer to The Freecycle Network. Attached hereto as Exhibit A is a true and correct copy of a search for the term "Freecycle" using Google.

4. The Freecycle Network is the world's largest Internet Web site dedicated to the promotion of reusing, recycling, and gifting. It has approximately 3500 groups worldwide in 67 countries and relies on over 6000 volunteers to make its recycling efforts function internationally. In an average month, The Freecycle Network's Web site gets about 14.8 million overall requests which translates to about 2.2 million page requests a month. The local member organizations of The Freecycle Network get a total of approximately 15-20 million hits per month.


I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Tucson, Arizona on May 8, 2006.

By: _____



Deron Beal

EXHIBIT A

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freecycle

Search

[Advanced Search](#)
[Preferences](#)
WebResults 1 - 50 of about 1,440,000 for **freecycle**. (0.11 seconds)**Freecycle**

Freecycle is an email list where people give away things that they no longer need for free.

www.freecycle.org/ - Similar pages

[Display All Freecycle Groups](#)

[FreecycleFinder — Latest ... - FAQ Pages - Freecyclepedia](#)

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Teen Girls Want Banged

Thousands of Local Hot Adult Ads
See Photos, Email These Girls Free
Adonica.net

freecycle.com

freecycle.com.

www.freecycle.com/ - 1k - [Cached](#) - [Similar pages](#)

Freecycle Deutschland - [[Translate this page](#)]

Homepage der deutschen **Freecycle**-Gruppen.

de.freecycle.org/ - 2k - [Cached](#) - [Similar pages](#)

freecycleportland : Freecycle™ Portland

freecycleportland: **Freecycle™** Portland. ... **Freecycle** instructional Video Click here to enlarge. ... **Freecycle** and the **Freecycle** logo are trademarks of ...

groups.yahoo.com/group/freecycleportland/ - 17k - [Cached](#) - [Similar pages](#)

freecyclenewyorkcity : Freecycle (TM) New York City

freecyclenewyorkcity: **Freecycle (TM)** New York City.

groups.yahoo.com/group/freecyclenewyorkcity/ - 17k - [Cached](#) - [Similar pages](#)

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United Kingdom (UK) Freecycle Groups' Homepage

Freecycle groups match people who have things they want to get rid of with people who can use them, and so keeping usable items out of landfills.

uk.freecycle.org/ - 10k - [Cached](#) - [Similar pages](#)

Freecycle in Norfolk

Norfolk **Freecycle** Groups. We have moved! Please update your bookmarks to: ...

Freecycle and the **Freecycle** logo are trademarks of The **Freecycle** Network in ...

www.freecycle-norfolk.org.uk/ - 2k - [Cached](#) - [Similar pages](#)

MAKE: Blog: FreeCycle

logo3.gif **FreeCycle** is a hub of email lists from different cities where you can post WANTED, OFFERED, or TAKEN messages to get, give and look for free stuff ...

www.makezine.com/blog/archive/2005/03/freecycle.html - 34k - [Cached](#) - [Similar pages](#)

Freecycle Network - Wikipedia, the free encyclopedia

The **Freecycle** Network (often abbreviated TFN) is a corporation registered as a ... By 2006, The **Freecycle** Network extended to over 3000 groups with almost 2 ...

en.wikipedia.org/wiki/Freecycle_Network - 25k - [Cached](#) - [Similar pages](#)

Freecycle - Wikipedia, the free encyclopedia

From Wikipedia, the free encyclopedia. Jump to: navigation, search. **Freecycle** may refer to: ... Retrieved from "http://en.wikipedia.org/wiki/**Freecycle**" ...

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Rhondda Cynon Taff **Freecycle**

News, help and advice from Rhondda Cynon Taff's biggest recycling organisation.
[freecycle.rhonddacynontaff.org/](#) - 57k - Cached - Similar pages

Howstuffworks "The **Freecycle** Network: Gift Economy"

The **Freecycle** Network hopes to encourage a "worldwide gift economy" -- one old ... In this article, we'll find out how the **Freecycle** Network got started, ...
[money.howstuffworks.com/freecycle-network.htm](#) - 36k - Cached - Similar pages

WorldChanging: Another World Is Here: **Freecycle**

As Andrew puts it, **Freecycle** combines "the Gift Economy, Sustainable Thinking, ... All you do is sign up for the **Freecycle** list for your hometown (there are ...
[www.worldchanging.com/archives/000444.html](#) - 15k - Cached - Similar pages

FreeCycle Computers

A non profit organization that accepts donated computers, refurbishes them and gives them to low income families.
[www.freecycle-computers.4t.com/](#) - 23k - Cached - Similar pages

Freecycle - Summary [Savannah]

Freecycle is a beat slicer running on GNU/Linux platform, ... **Freecycle** projects can now be saved and loaded. **Freecycle** project file contains the wave data, ...
[savannah.nongnu.org/projects/freecycle/](#) - 19k - Cached - Similar pages

Freecycle: A beat slicer

Freecycle is a beat slicer running on GNU/Linux platform using the QT toolkit, ... **Freecycle** is released under the GNU GPL Licence by Predrag Viceić.
[freecycle.redsteamrecords.com/](#) - 11k - Cached - Similar pages

The Journey - Rodney Olsen's blog about life, faith and family

These are just a few examples of how we've used **Freecycle**. It's a worldwide, free network that helps to keep what some consider to be junk out of landfill. ...
[rodneyolsen.blogspot.com/2006/04/freecycle.html](#) - 22k - Cached - Similar pages

Freecyclers, **Freecycle** Meetups, events, clubs and groups in your area

Meet other local people who use the **Freecycle** Network! Gather with others who enjoy the exchange of free stuff and discuss topics such as how freecycling ...
[freecycle.meetup.com/](#) - 22k - Cached - Similar pages

Freecycle - Division of Solid Waste Services

Try **Freecycle** to find new homes for these things. What changes hands through **Freecycle**? Clothing, furniture, electronics, building supplies, instruments, ...
[www.montgomerycountymd.gov/content/dpwt/SolidWaste/collection_services/recycling/freecycle.asp](#) - 16k - Cached - Similar pages

Lincoln Freecyclers

Lincoln Freecyclers. Reduce Waste, Preserve the Earth, Spend Less, Save Energy. Index · User list · Rules · Register · Login · Return to Freecyclers ...
[lincoln.freecyclers.org.uk/](#) - 18k - Cached - Similar pages

Freecycle - Waste Management

Freecycle is a grassroots community movement and nonprofit organization, ... Membership in **Freecycle** is free and open to all communities and all members ...
[www.wm.com/wm/freecycle.asp](#) - 7k - Cached - Similar pages

Freecycle and On-Line Local Community Software (by Jeremy Zawodny)

My local **freecycle** group, sanjosefreecycle is just a lightly moderated Yahoo! ... As a many months subscriber to my local **Freecycle** lists, I haven't found ...
jeremy.zawodny.com/blog/archives/006501.html - 30k - [Cached](#) - [Similar pages](#)

What's Up (or Down) at Freecycle?

Many of the groups leaving **FreeCycle** are showing up in the directory at FreeSharing.org. ... realized by **Freecycle.org** or the **Freecycle** Network Inc. ...
www.businessweek.com/the_thread/techbeat/archives/2005/08/whats_up_at_fre.html - 380k - [Cached](#) - [Similar pages](#)

Cool Tool: Freecycle

The worldwide **Freecycle** Network is a grassroots movement of people who are giving (& getting) stuff ... To sign up, find your city on the **Freecycle** website. ...
www.kk.org/cooltools/archives/000488.php - 15k - [Cached](#) - [Similar pages](#)

Freecycle.org

Check out <http://freecycle.org/> to find your local Yahoo group for **Freecycle**. ... **Freecycle** is really a great site and concept. I've moved a bunch so have ...
forums.dealofday.com/Freecycleorg-t-146755.html - 8k - [Cached](#) - [Similar pages](#)

Marlies' Creative Universe: Freecycle

The worldwide **Freecycle**™ Network is made up of many individual groups across the ... **Freecycle.org** connects pack rats with people who want their castoffs ...
www.mcupiverse.com/05/Freecycle.173.0.html - 66k - [Cached](#) - [Similar pages](#)

Is Freecycle Exceeding the Speed Limit? -- Chilling Effects ...

I'm writing on behalf of The **Freecycle** Network(TM) to notify you that your group is not an official **Freecycle** group and therefore does not have permission ...
www.chillingeffects.org/trademark/notice.cgi?NoticeID=3148 - 37k - [Cached](#) - [Similar pages](#)

As Freecycle grows, idealism and reality collide | By Matt Weiser ...

The first check arrived in February, and visitors to **Freecycle.org** will now ... Despite **Freecycle's** growing pains, Tilkin said most moderators and users ...
www.grist.org/news/maindish/2005/05/19/weiser-freecycle/ - 28k - [Cached](#) - [Similar pages](#)

Midquel... » Freecycle

However **Freecycle** is a lot more localized (at least in metro DC) and you have to live or work in the city of the **Freecycle** list to subscribe to. ...
www.midquel.com/?p=277 - 22k - [Cached](#) - [Similar pages](#)

Bostonist: Recycle or Freecycle?

That's where **FreeCycle** comes in. Rather than just leave perfectly good stuff ... **FreeCycle** is a tad bit more moderated than craigslist, but it works well. ...
www.bostonist.com/archives/2006/03/22/recycle_or_freecycle.php - 57k - [Cached](#) - [Similar pages](#)

Ming the Mechanic: Freecycle TM

I mentioned **Freecycle** recently. A site and a network for gift giving. Which is great. ... And the site is now blemished with "**Freecycle** TM". Looks stupid. ...
ming.tv/flemming2.php/_show_article/_a000010-001563.htm - 17k - [Cached](#) - [Similar pages](#)

Technorati Tag: freecycle

Problems with **FreeCycle**? Issues with **FreeCycle** Moderators? ... Frustration with **FreeCycle** and **FreeCycle** moderators has lead to lots of complaints and a ...
www.technorati.com/tags/freecycle - 51k - [Cached](#) - [Similar pages](#)

CJ's amazing journal of studyness - **Freecycle** database

So here's an example of what this database of **freecycle** might be good for. Tags: database, **freecycle**, recycling · Leave a comment. profile. CJ Collier ...
 cjcollier.livejournal.com/216811.html - 30k - [Cached](#) - [Similar pages](#)

FREE Services at Free Searching - The Biz Reference Tool. 'FIND it ...

A friend of mine introduced me to the **FreeCycle** web site and I'm passing it on to ... FREE: **FreeCycle**, The worldwide **Freecycle** Network is made up of many ...
 www.freesearching.com/free.htm - 42k - [Cached](#) - [Similar pages](#)

Purdue Online - **FreeCycle**

I was the owner of the original Lafayette, Indiana **Freecycle** group. For reasons that aren't really relevant to this post, I've left the **Freecycle** network ...
 www.purdueonline.com/showthread.php?t=2682 - 35k - [Cached](#) - [Similar pages](#)

Freecycle Connecticut - Clear Your Clutter By Giving Away Items ...

Freecycle Groups Help Connecticut Residents Clear Clutter, Find Free Stuff ... **Freecycle** is a network of groups organized geographically that helps ...
 hartford.about.com/od/househome/qt/qt**freecycle**ct.htm - 29k - [Cached](#) - [Similar pages](#)

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Freecycle Network Offers Never-Ending Garage Sale (And It's All Free!) ... The worldwide **Freecycle** Network is made up of many individual groups across the ...
 www.apcug.net/editorial/2005/060504.rtf - [Similar pages](#)

FREecycle.COM

Freecycle is the brainchild of Deron Beal, manager for a nonprofit ... After investigating **freecycle.org**, she decided to take the plunge and set up a site ...
 www.valcorerecycling.org/affair/archives/2005-01-23.htm - 15k - [Cached](#) - [Similar pages](#)

HouseofStrauss.co.uk - Web Links - **Freecycle.org**

HouseofStrauss.co.uk A resource of Insight for conscious living. Articles, news and discussion on alternative health, radical lifestyle, natural healing, ...
 houseofstrauss.co.uk/modules/weblinks/singlelink.php?lid=7 - 31k - [Cached](#) - [Similar pages](#)

GreenGonzo - **Freecycle** UK Search

Greengonzo lets you find things people are giving away for free in your area. Its like eBay, except everything's completely free.
 www.greengonzo.com/ - 9k - [Cached](#) - [Similar pages](#)

www.yorkrecycling.net

19th March 2006: York **Freecycle**™ is now has a Yahoo! Groups page. Click here for details. 28th October 2005: Our Recycling Cheats and Tips page is now ...
 www.yorkrecycling.net/ - 4k - [Cached](#) - [Similar pages](#)

Freecycle at Nuclear Moose Candy

This is to announce that there is now an official, sanctioned **Freecycle** ... The **Freecycle** Network™ is made up of many individual groups across the globe. ...
 nuclearmoose.com/archives/2005/09/22/**freecycle**/ - 14k - [Cached](#) - [Similar pages](#)

About **Freecycle**

Who: Livingston **Freecycle** has 2179 members and is one of 3370 **Freecycle** ... Details: www.freecycle.org for general information about the program or visit ...
 www.mlive.com/news/aanews/index.ssf?/base/news-6/1141400591296890.xml&coll=2 - 26k - [Cached](#) - [Similar pages](#)

A New beging for a great concept.

FreeCycle Earth · American Associates Associates Around The World · List Your Site Here Find Your State Here About Us. Visit and Support www.DeronBeal.org ... www.freecycleamerica.org/ - 13k - Cached - Similar pages

freshmeat.net: Project details for **Freecycle**

Freecycle is a beat slicer providing amplitude domain and frequency domain beat matching and zero ... <http://savannah.nongnu.org/cgi-bin/viewcvs/freecycle/> ... freshmeat.net/projects/freecycle/ - 24k - Cached - Similar pages

Google Groups: **Freecycle** Success Stories

Freecycle success stories voluntarily contributed by good stewards from ... Another **Freecycle** success story posted on the Ottawa **Freecycle** group today. ... groups-beta.google.com/group/FreecycleSuccessStories - 49k - [Cached](#) - [Similar pages](#)

CommunityWalk - Eastern Ontario **Freecycle** groups

These are pictures of the **Freecycle** booth at the Ottawa EcoStewardship Fair in April, 2005. ... Eric Snyder is the founder of the Ottawa **Freecycle** group. ... www.communitywalk.com/map/84 - 69k - [Cached](#) - [Similar pages](#)

LocalFreecycle - Group Map by Frappr Maps

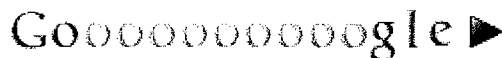
South Holland **Freecycle** covers the area to the South of The Wash...known as ... Cathy & Lynn Welcome you to Wigan **Freecycle**! wiganfreecycle@yahoogroups.com ... www.frappr.com/localfreecycle - 68k - Cached - Similar pages

NYE Open House and **Freecycle** Party « Aldoblog

I wrote previously about our New Year's Eve open house and "**freecycle**" party. ... And we have a planned a fun, interactive activity—a **Freecycle** Exchange! ... aldoblog.com/blog/419 - 15k - [Cached](#) - [Similar pages](#)

Sheffield | **FreeCycle** Sheffield

FreeCycle.org is an international network comprising of local groups. Sheffield **FreeCycle** was the first **FreeCycle** group in the UK, and now there is also a ... www.indymedia.org.uk/en/regions/sheffield/2004/01/283443.html - 34k - [Cached](#) - [Similar pages](#)



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