

1 I, Brian D. Hancock, declare as follows:

2 1. I am an attorney with the law firm of Heninger Garrison Davis, LLC, 2224 1st
3 Avenue North, Birmingham, Alabama 35203, counsel of record for Plaintiff Daniel M. Miller in
4 the above-styled litigation. This Declaration is given pursuant to Local Civil Rule 7-11(a).

5 2. The Plaintiff's Administrative Motion for a Sealing Order is being filed as a result
6 of Defendant Facebook, Inc.'s ("Facebook") refusal of Plaintiff's request that Facebook withdraw
7 confidentiality designations from certain evidentiary materials cited to, referenced, and attached as
8 exhibits to the Plaintiff's Memorandum of Points and Authorities in Support of His Motion for
9 Summary Judgment.
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11 3. Accordingly, a stipulation has not been obtained.

12 I declare under penalty of perjury that the foregoing is true and correct.
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15 March 3, 2011
16 Date

/s/ Brian D. Hancock
Brian D. Hancock