

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DANIEL M. MILLER,

Plaintiff,

v.

FACEBOOK, INC.; and YAO WEI YEO,

Defendants.

Case No. 1:09-CV-2810

**DECLARATION OF YVONNE
P. GREER IN SUPPORT OF
FACEBOOK INC.'S MOTION
TO TRANSFER VENUE**

I, Yvonne P. Greer, declare as follows:

1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel for Facebook, Inc. (“Facebook”) in the above-captioned action. I am a member of the Bar of the State of California. I make this Declaration in support of Facebook's motion to transfer venue. I have personal knowledge of the facts set forth in this declaration and could and would competently testify thereto under oath if called as a witness.

2. On information and belief, Plaintiff makes his claimed *Boomshine* work available at facebook.com. Attached hereto as **Exhibit 1** is a true and correct copy of a screen shot of *Boomshine* on facebook.com.

3. On October 27, 2009 and, again, on December 2, 2009, I asked our law firm's head research librarian, Heather Horter, to locate contact information on Defendant Yao Wei Yeo, as well any other research that might indicate his whereabouts. Based on the research provided, it appears that Mr. Yeo recently was employed by and worked at CourseHero, Inc., a company located in Sunnyvale, California, approximately ten miles from Facebook's headquarters in Palo Alto. On information and belief, based on Mr. Yeo's employment in Sunnyvale, Mr. Yeo is a resident of California.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the relevant excerpt from MOORE'S FEDERAL PRACTICE, §111.12[1][a] at p. 111-53.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 2nd day of December, at Menlo Park, California.

/s/ Yvonne P. Greer
Yvonne P. Greer
Attorney for FACEBOOK, INC.