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22 Attorneys for Plaintiff,
 23 DANIEL M. MILLER

24 **UNITED STATES DISTRICT COURT**
 25 **NORTHERN DISTRICT OF CALIFORNIA**
 26 **SAN FRANCISCO DIVISION**

27 DANIEL M. MILLER,)	
)	CASE NO.: CV-10-264 (WHA)
28 Plaintiff,)	
)	DECLARATION OF
29 vs.)	DOUGLAS L. BRIDGES
30 FACEBOOK, INC. and YAO WEI YEO,)	
)	
31 Defendants.)	
)	
)	
)	

1 I, Douglas L. Bridges, declare as follows:

2 1. My name is Douglas L. Bridges. I am over eighteen years of age and am
3 competent to testify about the matters set forth herein. I have personal knowledge of the matters
4 set forth herein.
5

6 2. I am an attorney at Heninger Garrison Davis, LLC, 1 Glenlake Parkway, Suite 700,
7 Atlanta, Georgia, 30328, the law firm representing Plaintiff Daniel M. Miller.
8

9 3. After filing the Complaint in the Northern District of Georgia, we performed a
10 diligent search to find Defendant Yao Wei Yeo so that we could serve the complaint upon Mr.
11 Yeo.

12 4. We had previously communicated with Mr. Yeo through an address at a dormitory
13 at Cornell University in Ithaca, NY.
14

15 5. When attempting communication with that dormitory at a later date, we were told
16 that Mr. Yeo had graduated and was no longer living in New York.

17 6. We performed a diligent search on the Internet for any information regarding Mr.
18 Yeo.

19 7. Attached hereto as Exhibit A is a complete corpus of information related to Mr.
20 Yeo.
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22 8. In September, 2009, Mr. Yeo's company, Zwigglers, informed Apple Computer
23 that it believed a third party, Aaron Ardiri, was infringing Zwigglers' common law "copyright" in
24 ChainRxn.

25 9. As a result of Zwigglers' complaint to Apple, Apple sent an email to Aaron Ardiri
26 noticing him of the allegation of infringement and providing Mr. Ardiri a contact phone number to
27 discuss the alleged infringement with Zwigglers.
28

1 10. Mr. Ardiri provided Plaintiff Miller with the Zwigglers contact phone number that
2 was provided to Mr. Ardiri.

3 11. Attached hereto as Exhibit B is a true and correct copy of the email from Mr. Ardiri
4 to Plaintiff Miller.

5 12. I attempted to contact Zwigglers through this contact phone number; however, no
6 person ever answered the phone number.
7

8 13. The voice mail system associated with the contact phone number was not
9 configured, so no message could be left at the contact phone number.

10 14. After receiving the phone number, I engaged Intelius, Inc. to perform a reverse
11 phone number look-up based upon the contact phone number and provide a report regarding the
12 look-up ("the Intelius report").
13

14 15. A true and correct copy of the Intelius report is attached hereto as Exhibit C.

15 16. The Intelius report provided a previous owner of the contact phone number and a
16 current owner of the phone number, neither of which were Mr. Yeo.
17

18 17. I also engaged MLQ Attorney Services to locate an address for Mr. Yeo.

19 18. MLQ Attorney Services did not find any public addresses or telephone numbers for
20 Mr. Yeo.

21 19. MLQ Attorney Services searched the Internet for public information related to Mr.
22 Yeo and provided entirely duplicative information from the Internet as that included in Exhibit A.
23

24 20. After filing suit, I had discussions with Mr. Craig W. Clark, in-house IP counsel for
25 Defendant Facebook, Inc.
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21. During my discussions with Mr. Clark, he represented that Facebook would not oppose discovery efforts against Facebook regarding information on Mr. Yeo if Plaintiff Miller would dismiss his suit against Facebook.

22. After the Court in the Northern District of Georgia transferred the matter to the Northern District of California, Mr. Clark again represented that Facebook, Inc. would not oppose discovery efforts against Facebook for information regarding Yeo if Plaintiff Miller would dismiss his suit against Facebook.

I declare under penalty of perjury that the foregoing is true and correct.

May 26, 2010

/s/ Douglas L. Bridges

Date

Douglas L. Bridges