

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MEKIKI CO., LTD. and MEKIKI)	
CREATES CO., LTD.,)	
)	
Plaintiffs and)	C.A. No. 09-745 (JAP)
Counter Defendants)	
)	JURY TRIAL DEMANDED
v.)	
)	
FACEBOOK, INC.,)	
)	
Defendant and)	
Counterclaimant.)	
_____)	

**SUPPLEMENTAL DECLARATION OF MICHELLE CUNANAN IN SUPPORT OF
DEFENDANT'S MOTION TO TRANSFER VENUE UNDER 28 U.S.C. § 1404(a)**

I, Michelle Cunanan, declare as follows:

1. I am employed by Defendant Facebook, Inc. ("Facebook") as in-house paralegal. I make this declaration in support of Facebook's Motion to Transfer Venue Under 28 U.S.C. § 1404(a). I have personal knowledge of the facts contained within this declaration, and if called as a witness, could testify competently to the matters contained herein.

2. Facebook is a Delaware corporation with its principal place of business in Palo Alto, California, within the Northern District of California.

3. I have been advised and understand that the only things within the control of Facebook that are relevant to this action are the equipment, employees, and documents related to the operation of Facebook's Friends and Networks technologies. Based on this understanding, all of Facebook's sources of proof and known witnesses relevant to this action are located and accessible in the Northern District of California. Moreover, Facebook does not sell or charge

fees for use of the Friends and Networks technologies and does not control the individual users of those services. Nevertheless, to the extent financial information or witnesses related to Facebook's finances becomes relevant to this case, such information and witnesses are presently located in the Northern District of California.

4. As I stated above, I understand that the only things within the control of Facebook that are relevant to this action are the equipment, employees, and documents related to the operation of Facebook's Friends and Networks technologies. Based on this understanding, other than being incorporated in Delaware, Facebook has no connection to the District of Delaware relevant to this case; Facebook has no offices or technical employees in Delaware and is not aware of any Facebook employee-witnesses, Facebook documents, or other Facebook evidence relevant to this case located there.

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

Dated: April 21, 2010

Signed: _____

A handwritten signature in blue ink, appearing to read "J. P. ...", is written over a horizontal line.