

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

PRAGMATUS AV, LLC,)	Civil Action No. 1:10-cv-1288 (LMB/JFA)
)	
Plaintiff)	
)	
v.)	
)	
FACEBOOK, INC., YOUTUBE, LLC,)	JURY TRIAL DEMANDED
LINKEDIN CORPORATION, and)	
PHOTOBUCKET.COM, INC.,)	
)	
Defendants.)	

**DECLARATION OF PHOTOBUCKET.COM, INC.
IN SUPPORT OF DEFENDANTS' MOTION TO TRANSFER**

I, Tom Munro, state as follows:

1. I am Chief Executive Officer of Photobucket.com, Inc. ("Photobucket"), a Defendant in the above style and numbered cause of action, and make this declaration in support of the motion to transfer made by Defendants.
2. Photobucket is incorporated in the state of Washington and has its principal place of business in Denver, Colorado.
3. Photobucket maintains an office located in San Francisco, California—which is in the Northern District of California—and does business within that district.
4. Photobucket's employees and engineers who could be potentially relevant to the claims and defense raised in this litigation are employed in the Photobucket San Francisco, California or Denver, Colorado offices.
5. All or substantially all documents maintained by Photobucket relating to its products are located in Denver, Colorado and this is also the location for Photobucket's servers and computers that may be implicated in this litigation.

6. Photobucket has no computer, server, or documents in the state of Virginia.
7. Photobucket has no employee relevant to this litigation in state of Virginia.
8. Photobucket has no offices or other facilities in the state of Virginia.
9. For any Photobucket officers or employees who may be called at trial, it would be more convenient for this case to proceed in the Northern District of California as they will have an easier time attending trial in California than Virginia and the cost and length of travel will be significantly reduced.

I declare under oath and under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Denver, Colorado, on January 6, 2011.



Tom Munro
Chief Executive Officer
Photobucket.com, Inc.