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6 Attorneys for Defendant YAHOO!, INC. and
Specially Appearing Defendant YAHOO!
7 HOLDINGS (HONG KONG), LTD.

8
9 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
10 **OAKLAND DIVISION**

11 WANG XIAONING, YU LING, SHI TAO,
and ADDITIONAL PRESENTLY
12 UNNAMED AND TO BE IDENTIFIED
INDIVIDUALS,

13 Plaintiff,

14 v.

15 YAHOO!, INC., a Delaware Corporation,
YAHOO! HOLDINGS (HONG KONG),
16 LTD., a Foreign Subsidiary of Yahoo!,
ALIBABA.COM, INC. a Delaware
17 Corporation, AND OTHER PRESENTLY
UNNAMED AND TO BE IDENTIFIED
18 INDIVIDUAL EMPLOYEES OF SAID
CORPORATIONS,

19 Defendant.
20

Case No. C07-02151 CW

**DECLARATION OF MATTHEW T.
KLINE IN SUPPORT OF DEFENDANT
YAHOO!, INC.'S MOTION FOR AN
EARLY CASE MANAGEMENT
CONFERENCE AND ORDER**

Date: July 2 or 26, 2007*
Time: TBD
Location: Courtroom 2

Judge: Hon. Claudia Wilken

1 I, Matthew T. Kline, declare:

2 1. I am counsel with the law firm of O'Melveny & Myers, LLP, attorneys of record
3 for defendant in this action, Yahoo!, Inc. ("Yahoo!"). I submit this declaration in support of
4 Defendant Yahoo!, Inc.'s Motion For An Early Case Management Conference and Order. Except
5 where indicated otherwise, I have personal knowledge of the facts stated herein and, if called as a
6 witness, I could and would testify competently thereto.

7 2. A true and correct copy of the Brief of the United States as Amicus Curae, *The*
8 *Presbyterian Church of Sudan v. Talisman*, United States Court of Appeal for the Second Circuit,
9 Case No. 07-0016 (filed May 15, 2007), is attached as Exhibit A.

10 3. A true and correct copy of the Statement of Interest of the United States, *Doe v.*
11 *Qi*, N.D. Cal. Case No. C02 0672 (filed Jan. 16, 2004), is attached as Exhibit B.

12 4. A true and correct copy of the Office of the Privacy Commissioner for Personal
13 Data, Hong Kong, *Report Published under Section 48(2) of the Personal Data (Privacy)*
14 *Ordinance (Cap. 486)*, *Report No.: R07-3619* (issued Mar. 14, 2007), is attached as Exhibit C.

15 I declare under penalty of perjury under the laws of the United States that the foregoing is
16 true and correct. Executed in Los Angeles, California on this 21st day of June 2007.

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20 Matthew T. Kline
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