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 17 WANG XIAONING, YU LING, SHI TAO

18 **UNITED STATES DISTRICT COURT**
 19 **NORTHERN DISTRICT OF CALIFORNIA**
 20 **OAKLAND DIVISION**

21 WANG XIAONING, YU LING, SHI TAO,
 22 and ADDITIONAL PRESENTLY
 23 UNNAMED AND TO BE IDENTIFIED
 24 INDIVIDUALS,

25 Plaintiffs,

26 v.

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

Defendants.

Case No. C07-02151 CW

TORT DAMAGES CLAIM

**DECLARATION OF MORTON SKLAR IN
 SUPPORT OF PLAINTIFFS' OPPOSITION
 TO DEFENDANTS' MOTION FOR AN
 EARLY CASE MANAGEMENT
 CONFERENCE AND ORDER**

Date: July 2 or 26, 2007 (Proposed)

Time: TBD

Location: Courtroom 2

Judge: Hon. Claudia Wilken

I, MORTON SKLAR, declare:

1. I am the Executive Director of the World Organization for Human Rights USA,

attorney of record and lead counsel for the Plaintiffs in the above-captioned case, and a former

Judge (for nine years) with one of the two international courts operated by the Organization of

Decl. of Morton Sklar ISO Plaintiffs'
 Opposition to Defendants' Motion For An
 Early Case Management Conference

Case No. C07-02151 CW

1 American States. This declaration is being submitted pursuant to Civil Local Rule 7-3 in support
2 of Plaintiffs' Opposition To Defendants' Motion To For An Early Case Management Conference.
3 Except where otherwise indicated, I have personal knowledge of the facts stated herein and, if
4 called as a witness, I could and would testify competently thereto.

5
6 2. In an opposition filed today titled Plaintiffs' Opposition To Defendants' Motion
7 For An Early Case Management Conference, Plaintiffs are requesting the Court to dismiss
8 Defendant Yahoo!'s Motion For An Early Case Management Conference, and to adhere to the
9 newly revised schedule for ADR and case management activities ordered by the Court on June
10 19, with the Initial Case Management Conference scheduled for September 18, 2007.

11 3. As previously indicated in my Declaration accompanying our Opposition to the
12 Defendants' Motion to Shorten Time for an early, July 2 Motions Hearing date on the request for
13 an early case management conference, Defendants' counsel prevailed upon me, as a matter of
14 professional courtesy, to enter into a Joint Stipulation with them to postpone the original case
15 management schedule initially set by the court, based on their vacation and travel plans. This
16 new schedule set a date for the initial case management conference with the Court for September
17 18. Had I known then that this request for a delay in the case management process was part of a
18 broader strategy by the Defendants seeking to bypass and undercut that process by proposing an
19 alternative approach that is not consistent with the regular case management procedures, I would
20 not have acceded to their request and agreed to the Joint Stipulation, since it is not in the
21 Plaintiffs' interests to delay the litigation process. Moreover, the representations made to me
22 regarding the difficulty of changing Mr. Petrocelli's travel plans were not entirely consistent with
23 the subsequent statements made to me suggesting that minor alterations could be made to
24 accommodate the revised schedule they later proposed, including a July 2 hearing date.
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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed in Washington, D.C. on this 29th day of June 2007.

/s/ Morton Sklar
Morton Sklar