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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

20 WANG XIAONING, YU LING, SHI TAO, and
 21 ADDITIONAL PRESENTLY UNNAMED AND TO
 22 BE IDENTIFIED INDIVIDUALS,
 23 Plaintiffs,
 24 v.
 25 YAHOO! INC., a Delaware Corporation, YAHOO!
 26 HONG KONG, LTD., a Foreign Subsidiary of Yahoo!,
 27 ALIBABA.COM INC., a Delaware Corporation AND
 28 OTHER PRESENTLY UNNAMED AND TO BE
 IDENTIFIED CORPORATE DEFENDANTS AND
 UNNAMED AND TO BE IDENTIFIED
 INDIVIDUAL EMPLOYEES OF SAID
 CORPORATIONS,
 Defendants.

CASE NO. C07-02151 CW

**JOINT DECLARATION OF MORTON SKLAR,
 MATTHEW T. KLINE, AND SCOTT REYNOLDS
 IN SUPPORT OF JOINT STIPULATION RE:
 WITHDRAWAL OF THE PLAINTIFFS' MOTION
 FOR LEAVE TO FILE SECOND AMENDED
 COMPLAINT, RE: FILING OF SECOND
 AMENDED COMPLAINT, AND RE: EXTENDING
 TIME DEADLINES ACCORDINGLY**

1 We—Morton Sklar, Executive Director of the World Organization for Human Rights USA,
2 representing the Plaintiffs; Matthew Kline for the law firm of O’Melveny and Myers LLP,
3 representing Defendant Yahoo!, Inc.; and Scott Reynolds of the law firm of Lovells LLP,
4 representing Defendant Alibaba.com, Inc.—hereby declare as follows:

5 1. On July 13, 2007, plaintiffs filed a Motion for Leave of the Court to File a Second
6 Amended Complaint. In the days following, defendants lodged objections to both the motion and
7 proposed amended complaint. Defendants also voiced concerns about the motion’s impact on the
8 schedule in the case.

9 2. Yesterday morning, the parties had a productive discussion regarding Plaintiffs’ pending
10 motion and schedule in the case. In order to save the Court’s and parties’ resources, and in order to
11 make sure that there is a final amended complaint to which defendants can soon respond, Defendants
12 and Plaintiffs agreed to the Stipulation being filed herewith and agreed to continue to work together
13 to make sure that this case is resolved expeditiously.

14 3. Rather than repeat the terms of the stipulation, we hereby incorporate them herein by
15 reference, including the description of the relief being sought, the need for this relief, and the impact
16 of this relief on the current schedule.

17 We declare under penalty of perjury under the laws of the United States that the foregoing is
18 true and correct. Executed in Washington, D.C. (Morton Sklar), Los Angeles, California (Matthew
19 T. Kline), and New York, New York (Scott Reynolds) on this 19th day of July 2007.
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21
22 By: /s/ Morton Sklar
Morton Sklar

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24 By: /s/ Matthew Kline
Matthew T. Kline

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26 By: /s/ Scott Reynolds
Scott Reynolds
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