

SEAN P. REIS (SBN 184044)
(sreis@edelson.com)
EDELSON MCGUIRE LLP
30021 Tomas Street, Suite 300
Rancho Santa Margarita, California 92688
Telephone: (949) 459-2124
Facsimile: (949) 459-2123

RAFEY S. BALABANIAN (Admitted *Pro Hac Vice*)
(rbalabanian@edelson.com)
EDELSON MCGUIRE LLC
350 North LaSalle Street, Suite 1300
Chicago, IL 60654
Telephone: (312) 589-6370
Facsimile: (312) 589-6378

JORDAN L. LURIE (130013)
(jlurie@weisslurie.com)
JOEL E. ELKINS (256020)
(jelkins@weisslurie.com)
WEISS & LURIE
10940 Wilshire Blvd, 23rd Floor
Los Angeles, CA 90024
Telephone: (310) 208-2800
Facsimile: (310) 209-2348

Attorneys for Plaintiffs and the Putative Class

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

NICOLE PIMENTAL and JESSICA)	Case No. 11-cv-02585-SBA
FRANKLIN, individually and on behalf of all)	
others similarly situated,)	
)	DECLARATION OF RAFEY S.
Plaintiff,)	BALABANIAN IN SUPPORT OF
)	PLAINTIFFS' ADMINISTRATIVE
v.)	MOTION FOR LEAVE TO FILE AN
)	OVERSIZED BRIEF
GOOGLE, INC., a Delaware corporation, and)	
SLIDE, INC., a Delaware corporation,)	
)	
Defendants.)	

DECLARATION OF RAFEY S. BALABANIAN

1 Pursuant to 28 U.S.C. § 1746, I hereby declare and state as follows:

2 1. I am over the age of eighteen and am fully competent to make this declaration.

3 I make this declaration based upon personal knowledge unless otherwise indicated.

4 2. I am a partner at the law firm of Edelson McGuire LLC, which has been
5 retained to represent the named Plaintiffs in this matter, Nicole Pimental and Jessica
6 Franklin.

7 3. Defendants' Motion to Dismiss raised complex and novel constitutional
8 issues, which necessitate comprehensive and well-developed arguments to properly oppose.

9 4. To fully address the issues raised in Defendants' Motion, provide the Court
10 with a complete argument, and ensure that Plaintiffs' interests are fully protected, Plaintiffs
11 prepared and filed an opposition totaling just over 22 pages, which is approximately seven
12 and a half pages over this Court's limitation.

13 5. While Plaintiffs made their best efforts to present their arguments in
14 opposition to Defendants' Motion as succinctly as possible, the additional seven pages was
15 needed to effectively lay out Plaintiffs' position.

16
17 I declare under penalty of perjury that the foregoing is true and correct.

18
19 Executed on December 7, 2011 at
20 Chicago, Illinois.

/s/ Rafey S. Balabanian