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9 UNITED STATES DISTRICT COURT  
 10 NORTHERN DISTRICT OF CALIFORNIA  
 11 SAN JOSE DIVISION

12 KINDERSTART.COM LLC, a California  
 13 limited liability company, on behalf of itself and  
 14 all others similarly situated,

15 Plaintiffs,

16 v.

17 GOOGLE, INC., a Delaware corporation,

18 Defendant.

19 Case No. C 06-2057 JF

20 **DECLARATION OF MARY PURKISS IN  
 21 SUPPORT OF PLAINTIFF'S MOTION  
 22 FOR PRELIMINARY INJUNCTION**

23 I, MARY PURKISS, HEREBY DECLARE AS FOLLOWS:

24 1. My name is Mary Purkiss. My business and residence are situated in the State of  
 25 Arizona.

26 2. I am a 51% shareholder and President of a privately owned corporation named  
 27 Beauties Designs, Inc. (BDI) that owns and manages [www.beauties.com](http://www.beauties.com). While being  
 28 diagnosed with and treated for breast cancer, I launched BDI and this site in 2001 to promote  
 breast cancer awareness through the Internet sale of jewelry and other personal effects that  
 contain or present the "pink ribbon" as a sign of breast cancer awareness. My husband Ed  
 Purkiss and I are very fortunate to consider myself as a survivor of this disease.

1 3. BDI bears the message of hope and encouragement about breast cancer as  
2 follows:

3  
4 Every day, all of us at Beaux Tie Designs speak to many wonderful survivors and  
5 supporters of the breast cancer cause, who share stories of their breast cancer experience.  
6 Many of these stories are heart-wrenching, difficult, and amazing all at the same time. ...  
7 We would like to share these wonderful stories with you as a tribute in honor and  
8 memory of these special people! If you know of someone who should be added to our  
9 Inspirational Gallery, please click here.

10 www.beauxties.com (Tab "Survivor Gifts and Stories / Inspirational Stories").

11 4. For every item purchased on our site, the customer will automatically designate  
12 15% of the purchase price to promote breast cancer awareness with a direct transfer of such  
13 funds to the Arizona Institute for Breast Health. BDI's website www.beauxties.com is shown as  
14 a link on the website (www.aibh.org) of Arizona Institute for Breast Health in Scottsdale,  
15 Arizona. Our customers, who hail from all 50 states, support breast cancer awareness and share  
16 their impressions on our site. By way of example only, one customer posted this on our site:

17 Thank you! I love that you donate! Not only did I like your products, but a portion went  
18 to the Arizona Institute for Breast Health! *Sue S. - Oceanside, CA*

19 5. BDI has no physical store front or pedestrian traffic. Instead, 99% of our visitors  
20 and customers come through the Internet by way of search engine traffic.

21 6. In the month of December 2005, www.beauxties.com suffered in an unexplained,  
22 sudden loss of traffic from Google. Our PageRank on the home page went down to '0' and the  
23 site was no longer indexed at all on Google. Even on the most basic key word searches, our site  
24 used to have ranking on the first several pages of the results pages, but www.beauxties.com was  
25 nowhere to be found. This condition of total site blockage by Google remains today.

26 7. On information and belief, BDI qualifies as one of the members of the Class in  
27 this action.

28 I DECLARE UNDER PENALTY OF PERJURY, that the above is based on my personal  
knowledge and, where indicated, on information and belief.

Executed on this 5th day of May, 2006 in Phoenix, Arizona.

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By: Mary Purkiss  
MARY PURKISS

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PLAINTIFF'S MOTION

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