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

Winston & Strawn LLP
 101 California Street
 San Francisco, CA 94111-5802

11	TECHCRUNCH, INC., et al.)	Case No. C 09-cv-05812-RS (PSG)
12	Plaintiffs,)	DECLARATION OF NICHOLAS W. SHORT IN SUPPORT OF PLAINTIFFS' APPLICATION FOR DEFAULT JUDGMENT AGAINST DEFENDANT FUSION GARAGE PTE, LTD.
13	vs.)	
14	FUSION GARAGE PTE. LTD.,)	
15	Defendant.)	
16)	Date: April 19, 2012
)	Time: 1:30 p.m.
)	Judge: Hon. Richard Seeborg
)	Location: Courtroom 3, 17th Floor

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1 I, Nicholas W. Short, declare as follows:

2 1. I am an associate with the law firm of Winston & Strawn LLP and a member in good
3 standing of the Bar of this Court. I have personal knowledge of the facts set forth herein, and can
4 testify competently to the same if asked to do so.

5 2. Attached hereto as **Exhibit A** is a true and correct copy of a string of email
6 correspondence, to which Chandrasekar Rathakrishnan was a party, dated February 28, 2010.
7 Defendant Fusion Garage PTE, Ltd. produced this email string in this litigation, and it has BATES
8 stamp FG00042327-FG00042329.

9 3. Attached hereto as **Exhibit B** is a true and correct copy of a PayPal FIT Page for a
10 business account for Chandrasekar Rathakrishnan that PayPal, Inc. produced under subpoena in this
11 lawsuit.

12 4. Attached hereto as **Exhibit C** is a true and correct copy of a PayPal FIT Page for
13 Chandrasekar Rathakrishnan that PayPal, Inc. produced under subpoena in this lawsuit.

14 5. Attached hereto as **Exhibit D** is a true and correct copy of a PayPal FIT Page for
15 Chandrasekar Rathakrishnan that PayPal, Inc. produced under subpoena in this lawsuit.

16 6. Attached hereto as **Exhibit E** is a true and correct copy of a PayPal FIT Page for
17 Chandrasekar Rathakrishnan that PayPal, Inc. produced under subpoena in this lawsuit.

18 7. Attached hereto as **Exhibit F** is a true and correct printed copy of a WHOIS search
19 result for a search that I ran for FusionGarage.com on the www.godaddy.com website on March 6,
20 2012 by searching for that domain name and then clicking on a hyperlink to view the WHOIS listing
21 for the domain name.

22 8. Attached hereto as **Exhibit G** is a true and correct printed copy of a WHOIS search
23 result for a search that I ran for JooJoo.com on the www.godaddy.com website on March 6, 2012 by
24 searching for that domain name and then clicking on a hyperlink to view the WHOIS listing for the
25 domain name.

26 9. Attached hereto as **Exhibit H** is a true and correct copy of Fusion Garage Pte. Ltd.'s
27 Supplemental Responses to Interrogatory No. 10 in this lawsuit dated July 19, 2010.

28 10. Attached hereto as **Exhibit I** is a true and correct copy of excerpts from the

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deposition of Chandrasekar Rathakrishnan conducted in this lawsuit on April 22, 2010.

I declare under penalty of perjury that the foregoing is true and accurate.

Dated: March 23, 2012

By: /s/ - Nicholas Short
Nicholas W. Short

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