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8 Attorneys for Plaintiff  
 9 ZYNGA GAME NETWORK INC.

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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

ZYNGA GAME NETWORK INC., a Delaware  
 Corporation,  
  
 Plaintiff,  
  
 v.  
  
 JASON WILLIAMS, an individual, LUNA  
 MARTINI, an individual, and JOHN DOES 1-5  
 D/B/A MW GROUP  
  
 Defendants.

**CASE NO. CV-10:01022 JF (PVTx)**

**DECLARATION OF TARA D. ROSE  
 SUPPORTING PLAINTIFF'S SECOND  
 MOTION TO CONTINUE CASE  
 MANAGEMENT CONFERENCE**

1 I, Tara D. Rose, declare as follows:

2 1. I am an associate with the law firm of Keats McFarland & Wilson LLP, counsel to  
3 Plaintiff Zynga Game Network Inc. (“Zynga”) in this case. I am over the age of eighteen, and unless  
4 otherwise stated herein, I have personal knowledge of the facts stated in this declaration, and if  
5 called upon to do so, I could and would testify competently thereto.

6 2. Zynga requests that the Case Management Conference be continued because Zynga  
7 has not yet confirmed the identity and location of Defendants in this matter, and has not yet been  
8 able to serve Defendants with process.

9 3. Zynga is unable to present its Motion to Continue Case Management Conference as a  
10 stipulated motion because it has not yet been able to serve Defendants with process.

11 4. On May 20, 2010, the Court authorized Zynga to conduct third party discovery to  
12 determine the identities and locations of the defendants in this case. (*See* Dkt. No. 14.) Zynga  
13 subsequently issued third party subpoenas to Internet domain name registrar GoDaddy.com, Inc.,  
14 credit card processing company PayPal, Inc. and web host Microsoft Office Live, as authorized by  
15 the Court.

16 5. Production from GoDaddy.com, Inc. revealed the same bogus addresses as those  
17 listed for the defendants in the Whois database information Domain History for the Internet domain  
18 names MWBLACKMARKET.COM, MWFEXPRESS.COM and MAFIAWARSDIRECT.COM.

19 6. Production from PayPal, Inc. revealed a name and address of an individual in Taiwan.  
20 Zynga is currently working with local counsel in Taiwan to confirm whether this name and address  
21 exists in Taiwan.

22 7. Zynga is currently awaiting responsive documents and information from Microsoft  
23 Office Live.

24 8. Failure to continue the Case Management Conference would prejudice Zynga’s  
25 ability to prosecute its case against Defendants because the parties would not be able to present the  
26 Joint Case Management Statement required by Federal Rule of Civil Procedure 26(f) and the Joint  
27 ADR forms as required by ADR Local Rule 3-5.

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9. The Court previously continued the Case Management Conference in this case from June 1, 2010 to August 27, 2010.

10. The requested continuance will not affect the schedule for this case other than the Case Management Conference because the Court has not yet issued a scheduling order pursuant to Rule 16(b).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 6th day of August, 2010 at Beverly Hills, CA.

\_\_\_\_\_/s/\_\_\_\_\_  
Tara D. Rose