

# EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION**

<p style="text-align:center">PRAGMATUS AV, LLC,  Plaintiff,  v.  FACEBOOK, INC.,  Defendant.</p>	<p style="text-align:center">Civil Action No. 2:10-cv-00560 (HCM/FBS)</p>
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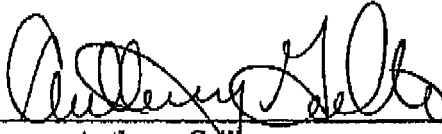
**DECLARATION OF ANTHONY GRILLO**

I, Anthony Grillo, declare the following:

1. I am Anthony Grillo. I make this declaration based on my personal knowledge.
2. I am providing this declaration in connection with the opposition of Pragmatus AV, LLC ("Pragmatus") to the motion to transfer venue filed by the defendant in this case.
3. Pragmatus is a limited liability company formed under the Virginia Limited Liability Company Act. Pragmatus has only two members, who own it on a 50-50 basis. I am one member, and the other is William Marino. I live in Pennsylvania.
4. I was involved in the acquisition by Pragmatus of a portfolio of patents that Pragmatus purchased from Intellectual Ventures. That portfolio included the patents involved in this case. I have personal knowledge regarding that transaction and the negotiations leading up to it. It would be far more convenient for me to travel to Virginia for trial than it would be for me to have to travel to California.

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

Dated: February 4, 2011

  
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Anthony Grillo