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11 *Attorneys for Plaintiffs*

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13 IN THE UNITED STATES DISTRICT COURT
14 SOUTHERN DISTRICT OF CALIFORNIA

15 SAMBREEL HOLDINGS LLC; YONTOO LLC;
16 and THEME YOUR WORLD LLC,

17 Plaintiffs,

18 vs.

19 FACEBOOK, INC.,

20 Defendant.

Case No. 3:12-CV-00668-W-KSC

**NOTICE OF MOTION AND MOTION FOR A
PRELIMINARY INJUNCTION**

Hon. Thomas J. Whelan

Hearing Date: April 23, 2012
Hearing Time: 10:00 a.m.
Dept: Courtroom 7

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22 TO DEFENDANT AND ITS ATTORNEYS OF RECORD:

23 PLEASE TAKE NOTICE THAT ON April 23, 2012 at 10:00 a.m. in the above-entitled Court,
24 located at 940 Front Street, San Diego, California, in Courtroom 7, Plaintiffs Sambreel Holdings LLC,
25 Yontoo LLC, and Theme Your World LLC (collectively "Sambreel") will move and hereby do move for
26 a preliminary injunction that (a) prevents Defendant Facebook, Inc. ("Facebook") from enforcing or
27 threatening to enforce the portions of its advertising and platform development policies that require
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1 Facebook's partners to boycott competing companies and (b) prevents Facebook from requiring
2 Sambreel users to uninstall any Sambreel product before accessing www.facebook.com.

3 Sambreel is entitled to the entry of a preliminary injunction for the reasons set forth in the
4 Memorandum of Points and Authorities in Support of Motion for Preliminary Injunction filed
5 concurrently herewith and based upon the legal authority stated therein. Sambreel has also filed the
6 following documents in support of this motion: (1) Declaration of Arie Trouw in Support of Motion for
7 Preliminary Injunction; (2) Declaration of Brad Miller in Support of Motion for Preliminary Injunction;
8 (3) Declaration of Andrew Sullivan in Support of Motion for Preliminary Injunction; (4) Declaration of
9 Markus Levin in Support of Motion for Preliminary Injunction; (5) Declaration of Robert Klinck in
10 Support of Motion for Preliminary Injunction; (6) Notice of Lodgment in Support of Motion for
11 Preliminary Injunction; and (7) Exhibits 1 – 24, which are attached to the Notice of Lodgment.

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13 Dated: March 19, 2012

LAW OFFICE OF GREGORY P. OLSON

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15 By: s/ Gregory P. Olson
16 Attorney for Plaintiffs
E-mail: greg@olsonesq.com

17 and

18 KOTCHEN & LOW LLP
19 DANIEL KOTCHEN
20 DANIEL LOW
ROBERT KLINCK

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF CALIFORNIA		FOR COURT USE ONLY
SAMBREEL HOLDINGS LLC v. FACEBOOK, INC.		
<p>Gregory P. Olson (Ca. Bar No. 177942) Law Office of Gregory P. Olson 501 West Broadway, Ste. 1370 San Diego, CA 92101 (619) 564-3650 greg@olsonesq.com</p> <p>Daniel Kotchen (Pro Hac Vice Application Forthcoming) Daniel Low (Pro Hac Vice Application Forthcoming) Robert Klinck (Pro Hac Vice Application Forthcoming) KOTCHEN & LOW LLP 2300 M Street NW, Suite 800 Washington, DC 20037 (202) 416-1848 dkotchen@kotchen.com dlow@kotchen.com rklinck@kotchen.com</p>		
Attorneys for: Plaintiffs SAMBREEL HOLDINGS LLC; YONTOO LLC; and THEME YOUR WORLD LLC	HEARING DATE-TIME-DEPT Hon. Thomas J. Whelan Date: April 23, 2012 Time: 10:00 a.m. Dept: Courtroom 7	CASE NUMBER 3:12-CV-00668-W-KSC

DECLARATION OF SERVICE

I am employed in the County of San Diego, California, in the office of a member of the bar of this Court at whose direction the service was made. I am over the age of eighteen years and not a party to the within action. My business address is 501 West Broadway, Suite 1370, San Diego, California 92101.

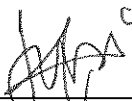
On March 19, 2012, I served the following document(s) on the interested parties in this action:

- (1) NOTICE OF MOTION AND MOTION FOR A PRELIMINARY INJUNCTION
- (2) PLAINTIFFS' MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION
- (3) DECLARATION OF ARIE TROUW IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION
- (4) DECLARATION OF MARKUS LEVIN IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION
- (5) DECLARATION OF BRAD MILLER IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION

- (6) DECLARATION OF ROBERT KLINCK IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION
- (7) DECLARATION OF ANDREW SULLIVAN IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION
- (8) NOTICE OF LODGMENT OF EXHIBITS IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION

Defendant FACEBOOK, INC.	<p>Agent for Service of Process: Corporation Service Company which will do business in California as CSC – Lawyers Incorporating Service 2730 Gateway Oaks Drive, Suite 100 Sacramento, CA 95833</p> <p>Craig Clark, Esq. (via email only) Legal Department FACEBOOK, INC. 1601 Willow Road Menlo Park, CA 94025 cwg@fb.com</p>
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- BY MAIL:** - I am “readily familiar” with the firm’s practice for collection and processing of correspondence for mailing with the United States Postal Service; and that the correspondence shall be deposited with the United States Postal Service this same day in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- BY ELECTRONIC MAIL:** On said date, I transmitted the aforementioned document via email to the above-named e-mail addresses from lkurniadi@kennylaw.net, and the transmission was reported as complete and without error.
- BY PERSONAL SERVICE:** I caused the listed documents to be personally delivered via Cal Express Attorney Service during business hours on March 19, 2012 to the parties at the addresses listed above. Personal Service to be completed by March 21, 2012.
- BY FACSIMILE TRANSMISSION:** from fax no. 619.233.1969 to the *above-listed facsimile number*. The facsimile machine I used complied with Rule 2003(3), and no error was reported by the machine.
- BY OVERNIGHT DELIVERY:** I deposited such envelope in a box or facility regularly maintained by the express service carrier in an envelope or package designated by the express service carrier with delivery fees provided for.
- (Federal) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on March 19, 2012 at San Diego, California.



Lusi E. Kurniadi