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11 *Attorneys for Plaintiffs*

12
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

**DECLARATION OF MARKUS LEVIN IN
SUPPORT OF MOTION FOR
PRELIMINARY INJUNCTION**

Hon. Thomas J. Whelan

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

21
22 **DECLARATION OF MARKUS LEVIN**

23 I, Markus Levin, declare as follows:

24 1. I am the Chief Executive Officer of Sterkly LLC, which is a subsidiary of Sambreel
25 Holdings LLC ("Sambreel"). My primary responsibility is to interact with the entities that market
26 Sambreel's products.

27 2. Sambreel uses a number of entities to market or advertise its products to acquire new
28

1 users. One entity that Sambreel used in the past was Neverblue, which is known as an affiliate network.
2 Neverblue used third parties to market Sambreel's products. In addition to affiliate network marketing,
3 Neverblue offers traditional online advertising and social networking advertising.

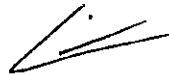
4 3. In August 2011, Sambreel learned that Facebook had approached Neverblue regarding its
5 marketing of Sambreel products. Based on those discussions, we learned that Facebook was threatening
6 to deactivate any Neverblue links that appeared on Facebook if Neverblue continued to market
7 PageRage.

8 4. Neverblue ceased doing business with Sambreel as a result of Facebook's pressure.

9 5. Exhibit 19 to Sambreel's Notice of Lodgment is a true and correct copy of an e-mail sent
10 by Reed Pridy of Neverblue and received by one of my direct reports – Marko Nikolic – on August 29,
11 2011.

12 I declare, under penalty of perjury, that the foregoing is true and correct to the best of my
13 knowledge.

14 Executed this 16th day of March 2012, at Carlsbad, California.

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16 _____
17 Markus Levin