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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 ANDREW SULLIVAN
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 ANDREW SULLIVAN**

23 I, Andrew Sullivan, declare as follows:

24 1. I am the President and Chief Executive Officer of Jeetyet Media, which is a subsidiary of
25 Sambreel Holdings LLC ("Sambreel"). My primary responsibility is to interact with the entities that
26 purchase advertising from Sambreel.

27 2. Beginning in July 2011, I began to hear that Facebook was approaching Sambreel's
28

1 advertising partners. These advertising partners informed me that Facebook asserted that advertising
2 with PageRage was a violation of Facebook's policies. Facebook told these firms that they would not be
3 allowed to continue to work with Facebook or the applications that operate on Facebook if they
4 continued to do business with PageRage.

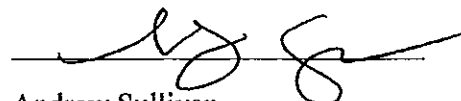
5 3. Between August and November 2011, seven of Sambreel's advertising partners stopped
6 doing business with PageRage. These entities are Rubicon Project, AdMeld, OpenX, Advertising.com,
7 LifeStreet, SayMedia, and Microsoft Media Network. Before Facebook's interference, purchases made
8 or brokered by these entities represented more than 80 percent of the advertising revenue for PageRage.

9 4. I am aware of three of Sambreel's advertising partners who would not agree to
10 Facebook's demands – ValueClick, Underdog, and CPX. These entities have been removed from
11 Facebook's list of approved advertisers for developers on the Facebook Platform.

12 5. Exhibit 18 to Sambreel's Notice of Lodgment is a true and correct copy of an e-mail I
13 received from Todd Rosenberg at OpenX on November 23, 2011.

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

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

17
18 
19 Andrew Sullivan