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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

HANGINOUT, INC.,
Plaintiff,
vs.
GOOGLE INC.,
Defendant.

CASE NO. 13-CV-2811 AJB NLS
**DECLARATION OF ELLERY
LONG IN SUPPORT OF
GOOGLE'S UNOPPOSED
MOTION TO SEAL DOCUMENTS**

Doc. 28 Att. 2

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Hanginout, Inc. v. Google, Inc.

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DECLARATION OF ELLERY LONG

I, Ellery Long, hereby declare:

1. I am currently employed by Google Inc. (“Google”) as the product marketing manager of Hangouts, Google’s video conferencing and messaging product. I make this declaration in support of Google’s Unopposed Motion to Seal Documents. I am over the age of eighteen. I know the facts stated herein of my own personal knowledge. If called to testify as a witness about them, I could and would do so competently and under oath.

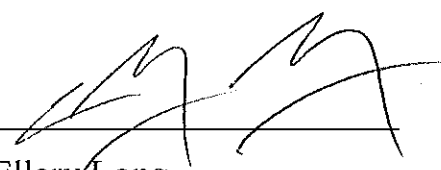
2. Google considers certain information in my declaration in support of Google’s Opposition to Hanginout’s Motion for Preliminary Injunction found in ¶ 5, line 6; ¶ 8, line 21; ¶ 9, line 24; ¶ 10, lines 6-7; and ¶ 11, line 9 to be highly sensitive and confidential business information.

3. The amount of money that Google has spent on specific types of advertising for specific products is non-public information. Making that information public would put Google at a competitive disadvantage because its competitors would be able to determine Google’s investment into and marketing of specific products.

4. Information regarding the number of uses and users of Hangouts and Hangouts On Air is non-public; making such information public would put Google at a competitive disadvantage because competitors would be able to determine the scope and reach of Hangouts and Hangouts On Air.

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

Executed on March 21, 2014 at Mountain View, California.


Ellery Long