

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LEADER TECHNOLOGIES, INC., a Delaware corporation,)	
)	
Plaintiff-Counterdefendant,)	Civil Action No. 08-862-JJF/LPS
)	
v.)	
)	PUBLIC VERSION
FACEBOOK, INC., a Delaware corporation,)	
)	
Defendant-Counterclaimant)	

**DECLARATION OF JAMES HANNAH IN SUPPORT OF PLAINTIFF
LEADER TECHNOLOGIES, INC.'S ANSWERING BRIEF IN OPPOSITION TO
DEFENDANT FACEBOOK INC.'S MOTION FOR LEAVE TO AMEND ITS
RESPONSIVE PLEADING TO ADD A COUNTERCLAIM OF FALSE MARKING**

OF COUNSEL:

Paul J. Andre
Lisa Kobialka
KING & SPALDING LLP
333 Twin Dolphin Drive
Suite 400
Redwood Shores, CA 94065
(650) 590-0700

Philip A. Rovner (#3215)
POTTER ANDERSON & CORROON LLP
Hercules Plaza
P. O. Box 951
Wilmington, DE 19899
(302) 984-6000
provner@potteranderson.com

*Attorneys for Plaintiff
Leader Technologies, Inc.*

Dated: November 9, 2009
Public Version: November 17, 2009

I, James Hannah, hereby declare:

1. I am an attorney with the law firm King & Spalding LLP, counsel of record for Plaintiff Leader Technologies, Inc. ("Leader"). I have personal knowledge of the facts set forth in this declaration and can testify competently to those facts.

2. Attached hereto as Exhibit A is a true and correct copy of Leader's First Supplemental Responses to Facebook, Inc.'s ("Facebook") Interrogatories Nos. 3 and 9, dated April 17, 2009.

3. Attached hereto as Exhibit B is a true and correct copy of Leader's Second Supplemental Response to Facebook's Interrogatory 9, dated September 15, 2009.

4. Attached hereto as Exhibit C is a true and correct copy of Leader's Responses to Facebook's Fourth Set of Interrogatories (Nos. 12-18), dated October 15, 2009.

5. Attached hereto as Exhibit D-1 is a true and correct copy of a letter from Meghan Wharton to Craig W. Clark regarding Leader's April 14, 2009 document production bearing bates range LTI 0000913 - 074166. Attached hereto as Exhibit D-2 is a true and correct copy of a letter from Gladys Tong to Craig W. Clark regarding Leader's August 3, 2009 document production bearing bates range LTI 074167 - 134198. Attached hereto as Exhibit D-3 is a true and correct copy of a letter from Gladys Tong to Craig W. Clark regarding Leader's August 18, 2009 document production bearing bates range LTI 134199 - 145927.

6. Attached hereto as Exhibit E is a true and correct copy of Leader's Second Supplemental Response to Facebook's Interrogatory No. 1, First Supplemental Responses to Facebook's Interrogatory Nos. 4, 11-17 and Third Supplemental Response to Facebook's Interrogatory No. 9, dated October 28, 2009.

7. Attached hereto as Exhibit F is a true and correct copy of Facebook's Sixth Set of Interrogatories to Leader, dated October 21, 2009.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct. Executed this 9th day of November 2009, at Redwood Shores, California.



James Hannah

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FOR THE DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on November 17, 2009, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

BY CM-ECF, E-MAIL AND HAND DELIVERY

Thomas P. Preston, Esq.
Steven L. Caponi, Esq.
Blank Rome LLP
1201 Market Street
Wilmington, DE 19801
Preston-T@blankrome.com
caponi@blankrome.com

I hereby certify that on November 17, 2009 I have sent by E-mail the foregoing document to the following non-registered participants:

Heidi L. Keefe, Esq.
Mark R. Weinstein, Esq.
Jeffrey Norberg, Esq.
Cooley Godward Kronish LLP
Five Palo Alto Square
3000 El Camino Real
Palo Alto, CA 94306-2155
hkeefe@cooley.com
mweinstein@cooley.com
jnorberg@cooley.com

/s/ Philip A. Rovner
Philip A. Rovner (#3215)
Potter Anderson & Corroon LLP
Hercules Plaza
P. O. Box 951
Wilmington, DE 19899
(302) 984-6000
provner@potteranderson.com