

**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 RYAN HOPKINS IN SUPPORT OF PLAINTIFF LEADER TECHNOLOGIES, INC.'S OPPOSITION TO DEFENDANT FACEBOOK INC.'S MOTION FOR LEAVE TO AMEND ITS RESPONSIVE PLEADING TO ADD A DEFENSE AND COUNTERCLAIM OF INEQUITABLE CONDUCT AND TO AMEND ITS FALSE MARKING COUNTERCLAIM

VOLUME 1 – EXHIBITS A-E

OF COUNSEL:

Paul J. André
Lisa Kobialka
King & Spalding, LLP
333 Twin Dolphin Drive
Suite 400
Redwood Shores, California 94065-6109
(650) 590-7100

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: April 12, 2010
Public Version: April 19, 2010

I, Ryan Hopkins, 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-1 is a true and correct copy of Facebook, Inc.'s ("Facebook") Objections and Responses to Plaintiff Leader's First Set of Interrogatories (1-13), served on March 23, 2009. Attached hereto as Exhibit A-2 is a true and correct copy of Facebook's First Supplemental Responses to Leader's Interrogatories Nos. 3, 4, 5, and 10, served on May 15, 2009. Attached hereto as Exhibit A-3 is a true and correct copy of Facebook's Responses to Leader's Fourth Set of Interrogatories, served on November 2, 2009. Attached hereto as Exhibit A-4 is a true and correct copy of Facebook's Supplemental Responses to Leader's Interrogatories Nos. 1-5, 7-11, 15-16, 18, served on November 20, 2009.

3. Attached hereto as Exhibit B is a true and correct copy Leader's First Supplemental Response to Facebook's Interrogatory No. 10, dated June 8, 2009.

4. Attached hereto as Exhibit C is a true and correct copy of Jeffrey Lamb's deposition transcript errata, dated March 31, 2010.

5. Attached hereto as Exhibit D is a true and correct copy of pages 98, 138-40, 142-43, 161-163 from the February 23, 2010 deposition transcript of Michael McKibben.

6. Attached hereto as Exhibit E is a true and correct copy of pages 246 and 298-99 from the February 24, 2010 deposition transcript of Michael McKibben.

7. Attached hereto as Exhibit F is a true and correct copy of Leader's Supplemental Responses to Facebook's First Set of Interrogatories Nos. 3 and 9, served on April 17, 2009.

8. Attached hereto as Exhibits G-1, G-2, and G-3 are true and correct copies of documents bearing production numbers FB00000288, FB0000289-90, and FB00000278-86, which were produced in this litigation by Facebook. Attached hereto as Exhibits G-4, G-5, G-6, G-7, G-8, G-9, G-10, G-11-, G-12, G-13, and G-14 are true and correct copies of documents bearing production numbers LTI_070591-93, LTI_070597, LTI_072257, LTI_007693,

LTI_070352-53, LTI_070420, LTI_071442, LTI_072842-43, LTI_076664, LTI_072400-02, and LTI_083018-26, which were produced in this litigation by Leader.

9. Attached hereto as Exhibit H are true and correct copy of Leader's First Supplemental Responses to Facebook's Seventh Set of Interrogatories, served on April 8, 2010.

10. Attached hereto as Exhibit I is a true and correct copy of an email from counsel for Facebook, Jeffrey Norberg, to counsel for Leader, James Hannah, dated February 23, 2010.

11. Attached hereto as Exhibit J are true and correct copy of a document bearing the production label number LTI_006469-73, which was produced by Leader on April 14, 2009.

12. Attached hereto as Exhibit K is a true and correct copy of a letter from Kristopher Kastens to Jeffrey Norberg, dated March 9, 2010.

13. Attached hereto as Exhibit L is true and correct copy of a document bearing production label numbers LTI_155168-76 , which were produced by Leader in this litigation.

14. Attached hereto as Exhibit M is true and correct copy of a document bearing production label numbers LTI_151129-37, which were produced by Leader in this litigation.

15. Attached hereto as Exhibit N is true and correct copy of a document bearing production label numbers LTI_147493-96, which were produced by Leader in this litigation.

16. Attached hereto as Exhibit O-1, O-2, O-3, and O-4 are true and correct copies of documents bearing production numbers LTI_148159-64, LTI_148169-86, LTI_148743-46, and LTI_150979-84, which were produced by Leader in this litigation.

17. Attached hereto as Exhibit P is a true and correct copy of pages 227-230 from the February 19, 2010 deposition transcript of Jeffrey Lamb.

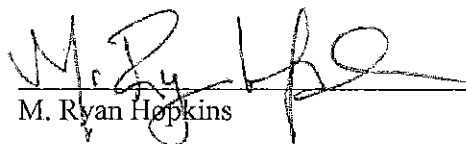
18. Attached hereto as Exhibit Q is a true and correct copy of a document about Provisional Applications for Patent, dated April 2005, downloaded from the United States Patent and Trademark Office at www.uspto.gov/web/offices/com/iip/documents/provisional.pdf, last visited April 8, 2010.

19. Attached hereto as Exhibit R is a true and correct copy of an email chain between counsel for Leader, James Hannah, and counsel for Facebook, Jeffrey Norberg, dated March 5,

2010 to March 8, 2010.

20. Attached hereto as Exhibit S is a true and correct copy of an email chain between counsel for Leader, James Hannah, and counsel for Facebook, Jeffrey Norberg, dated March 7, 2010 to March 9, 2010.

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 12th day of April 2010, at Redwood Shores, California.


M. Ryan Hopkins

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

CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on April 19, 2010, 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 AND E-MAIL

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 April 19, 2010 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.
Melissa H. Keyes, 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
mkeyes@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