

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

LEADER TECHNOLOGIES, INC., a
Delaware corporation,

Plaintiff-Counterdefendant,

v.

FACEBOOK, INC., a Delaware corporation,

Defendant-Counterclaimant.

Civil Action No. 08-862-JJF/LPS

**DECLARATION OF ELIZABETH STAMESHKIN IN SUPPORT OF DEFENDANT
FACEBOOK, INC.'S REPLY BRIEF IN SUPPORT OF ITS MOTION FOR LEAVE TO
AMEND ITS RESPONSIVE PLEADING TO ADD A DEFENSE AND COUNTERCLAIM
OF INEQUITABLE CONDUCT AND TO AMEND ITS FALSE MARKING
COUNTERCLAIM**

I, Elizabeth Stameshkin, declare:

1. I am an attorney with Cooley Godward Kronish LLP, of counsel in this action for Defendant Facebook, Inc. ("Facebook"). I make this declaration in support of Facebook's Reply Brief In Support of its Motion for Leave to Amend Its Responsive Pleading to Add a Defense and Counterclaim of Inequitable Conduct and to Amend Its False Marking Counterclaim. I have personal knowledge of the facts contained within this declaration, and if called as a witness, could testify competently to the matters contained herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the transcript of the April 9, 2010 teleconference hearing with Magistrate Judge Stark.

3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the transcript of the February 17, 2010 deposition of Tim Fathbruckner.

4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the transcript of the February 23, 2010 deposition of Michael McKibben.

5. Attached hereto as Exhibit 4 is a true and correct copy of Leader Technologies, Inc.'s First Supplemental Responses to Facebook, Inc.'s Seventh Set of Interrogatories.

6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts of Leader Technologies, Inc.'s Responses to Facebook, Inc.'s First Set of Interrogatories (1-9).

7. Attached hereto as Exhibit 6 is a true and correct copy of the February 9, 2010 Inter Partes Reexamination Order.

8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts of the Expert Report of Saul Greenberg.

9. Attached hereto as Exhibit 8 is a true and correct copy of excerpts from the transcript of the February 24, 2010 deposition of Michael McKibben.

10. Attached hereto as Exhibit 9 is a true and correct copy of a document bearing production label numbers LTI 002878, which was produced in this litigation by Leader Technologies.

11. Attached hereto as Exhibit 10 is a true and correct copy of a document bearing production label numbers LTI 064039-57, which was produced in this litigation by Leader Technologies.

12. Attached hereto as Exhibit 11 is a true and correct copy of a April 12, 2010 letter from Gladys Tong to Jeffrey Norberg enclosing documents bearing Bates range LTI 157162-64.

13. Attached hereto as Exhibit 12 is a true and correct copy of a April 13, 2010 letter from Kristopher Kastens to Heidi Keefe re Demonstrations of the Leader2Leader product.

14. Attached hereto as Exhibit 13 is a true and correct copy of a document bearing production label numbers LTI 148978-81, which was produced in this litigation by Leader Technologies.


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I declare under penalty of perjury that the foregoing is true and correct. Executed on
April 22, 2010 in Palo Alto, California.


Elizabeth Stameshkin