

**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 HEIDI L. KEEFE IN SUPPORT OF DEFENDANT FACEBOOK,
INC.'s MOTION FOR SUMMARY JUDGMENT OF NON-INFRINGEMENT AND NO
DAMAGES (MOTION NO. 2 OF 6)**

I, Heidi L. Keefe, 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 Motion for Summary Judgment of Non-Infringement and No Damages (No. 2 of 6). 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 A is a true and correct copy of U.S. Patent No. 7,139,761.

3. Attached hereto as Exhibit B is a true and correct copy of the Disclosure of Expert Testimony for Giovanni Vigna, Ph.D. Pursuant to Fed. R. Civ. P. 26(A)(2).

4. Attached hereto as Exhibit C is a true and correct copy of excerpts from the deposition of Russell Parr, taken in this action on April 29, 2010.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 14, 2010 in Palo Alto, California.

/s/

A handwritten signature in cursive script, appearing to read "Heidi Keefe", is written over a horizontal line.

Heidi L. Keefe