

IN THE UNITED STATES COURT
FOR THE DISTRICT OF DELAWARE

LEADER TECHNOLOGIES, INC., a Delaware corporation,)	
)	CIVIL ACTION
Plaintiff and Counterdefendant,)	
)	No. 1:08-cv-00862-JJF
v.)	
)	
FACEBOOK, INC., a Delaware corporation,)	
)	
Defendant and Counterclaimant.)	
)	

**DECLARATION OF KATHRYN ROBINSON IN SUPPORT OF DEFENDANT
FACEBOOK, INC.'S OPPOSITION TO LEADER TECHNOLOGIES, INC.'S
PRETRIAL MOTIONS**

I, Kathryn Robinson, declare:

1. I am an attorney with Cooley LLP, of counsel in this action for Defendant Facebook, Inc. ("Facebook"). I make this declaration in support of Facebook's Opposition to Leader Technologies, Inc. *Motions in Limine* and *Daubert* Motions. 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 the Expert Report of Saul Greenberg, Ph.D., dated April 8, 2010.

3. Attached hereto as Exhibit 2 is a true and correct copy of U.S. Patent No. 6,308,179.

4. Attached hereto as Exhibit 3 is a true and correct copy of U.S. Patent No. 6,370,538.

5. Attached hereto as Exhibit 4 is a true and correct copy of U.S. Patent No. 6,941,313.

6. Attached hereto as Exhibit 5 is a true and correct copy of the Order Granting Request for Ex Parte Reexamination for U.S. Patent No. 7,139,761, dated September 25, 2009.

7. Attached hereto as Exhibit 6 is a true and correct copy of the Order Granting Request for Inter Partes Reexamination for U.S. Patent No. 7,139,761, dated February 09, 2010.

8. Attached hereto as Exhibit 7 is a true and correct copy of the Expert Report of Michael Kearns, Ph.D., dated April 22, 2010.

9. Attached hereto as Exhibit 8 is a true and correct copy of excerpts from the transcript of the May 6, 2010 deposition of Michael Kearns, including pages 1, 5, 51-52, 179-181, and 234.

10. Attached hereto as Exhibit 9 is a true and correct copy of Defendant Facebook, Inc.'s Supplemental Responses to Plaintiff Leader Technologies, Inc.'s Interrogatories Nos. 1-5, 7-11, 15-16, 18, dated November 20, 2009.

11. Attached hereto as Exhibit 10 is a true and correct copy of Plaintiff Leader Technologies, Inc.'s Supplemental Responses to Defendant Facebook, Inc.'s Interrogatory Nos. 1, 4, 5, 7, 10, 12-18, dated April 1, 2010.

12. Attached hereto as Exhibit 11 is a true and correct copy of excerpts from the transcript of the May 4, 2010 deposition of Christopher J. Bokhart, including pages 1, 3, 53-64, 241-258, and 260.

13. Attached hereto as Exhibit 12 is a true and correct copy of Defendant Facebook, Inc.'s Responses to Plaintiff Leader Technologies, Inc.'s Fifth Set of Interrogatories, dated November 20, 2009.

14. Attached hereto as Exhibit 13 is a true and correct copy of Facebook, Inc.'s First Set of Interrogatories to Leader Technologies, Inc., dated February 18, 2009.

15. Attached hereto as Exhibit 14 is a true and correct copy of Facebook, Inc.'s First Set of Requests for Production of Documents to Leader Technologies, Inc., dated February 18, 2009.

16. Attached hereto as Exhibit 15 is a true and correct copy of Facebook, Inc.'s Second Set of Request for Production of Documents to Leader Technologies, Inc., dated September 16, 2009.

17. Attached hereto as Exhibit 16 is a true and correct copy of excerpts from the transcript of the February 23, 2010 deposition of Michael T. McKibben, including pages 1-6, 79-81, 95-120, 131-134, 138-140, 142-147, 152-185, and 229-231.

18. Attached hereto as Exhibit 17 is a true and correct copy of excerpts from the transcript of the April 9, 2010 Teleconference hearing before the Honorable Leonard P. Stark, including pages 1, 2, and 38-39, and 54.

19. Attached hereto as Exhibit 18 is a true and correct copy of Leader Technologies, Inc.'s Responses to Facebook, Inc.'s First Set of Interrogatories (1-9), dated March 20, 2009.

20. Attached hereto as Exhibit 19 is a true and correct copy of Leader Technologies, Inc.'s First Supplemental Responses to Facebook, Inc.'s Interrogatories Nos. 3 and 9, dated April 17, 2009.

21. Attached hereto as Exhibit 20 is a true and correct copy of Facebook, Inc.'s Objections and Responses to Plaintiff Leader Technologies, Inc.'s First Set of Interrogatories (1-13), served March 23, 2009.

22. Attached hereto as Exhibit 21 is a true and correct copy of Leader Technologies,

Inc.'s Responses to Facebook, Inc.'s Second Set of Requests for Admissions to Leader Technologies, Inc. (Nos. 21-25), dated November 20, 2009.

23. Attached hereto as Exhibit 22 is a true and correct copy of Leader Technologies, Inc.'s Responses to Facebook, Inc.'s Sixth Set of Interrogatories (Nos. 22-35), dated November 20, 2009.

24. Attached hereto as Exhibit 23 is a true and correct copy of the Expert Damages Report of Russell L. Parr, CFA, ASA, dated April 8, 2010.

25. Attached hereto as Exhibit 24 is a true and correct copy of excerpts from the transcript of the May 1, 2010 deposition of James Patrick Hughes, including 1, 5-7, 11-15, 40, 45, 173, 177, 189-190.

26. Attached hereto as Exhibit 25 is a true and correct copy of Leader Technologies, Inc.'s First Supplemental Responses to Facebook, Inc.'s Seventh Set of Interrogatories, dated April 8, 2010.

27. Attached hereto as Exhibit 26 is a true and correct copy of the Brief of *Amicus Curiae* Public Patent Foundation in Support of Plaintiff's Opposition to Defendant's Motion to Dismiss, in *Juniper Networks, Inc. v. Shipley*, Case No. C09-00696-SBA, in the Northern District of California, dated July 14, 2009.

28. Attached hereto as Exhibit 27 is a true and correct copy of Leader Technologies, Inc.'s Responses to Facebook, Inc.'s Fifth Set of Requests for Production of Documents to Leader Technologies, Inc. (Re: Marking), dated March 5, 2010.


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29. Attached hereto as Exhibit 28 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), dated April 8, 2010.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 27, 2010 in Palo Alto, California



Kathryn Robinson