

**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 FACEBOOK,  
INC.'s RENEWED MOTIONS FOR JUDGMENT AS A MATTER OF LAW**

I, Elizabeth Stameshkin, 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, Inc.'s Renewed Motions for Judgment as a Matter of Law (JMOL). 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 true and correct copies of excerpts from the transcript of the jury trial in this action held July 19-27, 2010.
3. Attached hereto as Exhibit 2 is a true and correct copy of Facebook's Terms of Use, dated September 23, 2008, admitted as trial exhibit PTX-628.
4. Attached hereto as Exhibit 3 is a true and correct copy of Facebook Platform White Paper IX, dated March 24, 2009, admitted as trial exhibit PTX-145.
5. Attached hereto as Exhibit 4 is a true and correct copy of U.S. Patent No 7,139,761, admitted as trial exhibit PTX-1.
6. Attached hereto as Exhibit 5 is a true and correct copy of Robert C. Faber, *Faber on Mechanics of Patent Claim Drafting*, App. D (2009).

7. Attached hereto as Exhibit 6 is a true and correct copy of Facebook Website Screenshots, bearing Bates numbers LTI 157071-137, admitted as trial exhibit PTX-942.
8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts from Defendant Facebook, Inc.'s Supplemental Responses to Plaintiff Leader Technologies, Inc.'s Interrogatories Nos. 1-5, 7-11, 15-16, 18, date November 20, 2009, including pages 1-25, 119-120.
9. Attached hereto as Exhibit 8 is a true and correct copy of the January 5, 2006 Final Rejection of U.S. Patent Application No. 10/732,744.
10. Attached hereto as Exhibit 9 is a true and correct copy of the June 21, 2006 Supplemental Reply to a Reply to the Final Office Action Dated January 5, 2006 that Accompanied the RCE for U.S. Patent Application No. 10/732,744.
11. Attached hereto as Exhibit 10 is a true and correct copy of the August 30, 2006 Examiner Interview Summary Record for U.S. Patent Application No. 10/732,744.
12. Attached hereto as Exhibit 11 is a true and correct copy of the August 30, 2006 Notice of Allowability for U.S. Patent Application No. 10/732,744.
13. Attached hereto as Exhibit 12 is a true and correct copy of the May 5, 2006 Reply to Final Office Action Dated January 5, 2006 for U.S. Patent Application No. 10/732,744.
14. Attached hereto as Exhibit 13 is a true and correct copy of excerpts from the transcript of the July 1, 2010 Pretrial Conference.
15. Attached hereto as Exhibit 14 is a true and correct copy of Disclosure of Expert Testimony for Giovanni Vigna, Ph.D. Pursuant to Fed. R. Civ. P. 26(A)(2), dated April 8, 2010.
16. Attached hereto as Exhibit 15 is a true and correct copy of excerpts from the transcript of the May 3, 2010 deposition of Giovanni Vigna, Ph.D.
17. Attached hereto as Exhibit 16 are true and correct copies emails between James Hannah and Jeffrey Norberg, dated July 19, 2010. Also included is a copy of the demonstratives as provided by Leader's counsel on July 19, 2010.

18. Attached hereto as Exhibit 17 is a true and correct copy of pages from the Facebook Developer Wiki, bearing Bates numbers LTI 156964-67, admitted as trial exhibit PTX-904.

19. Attached hereto as Exhibit 18 is a true and correct copy of pages from the Facebook Developer Wiki, bearing Bates numbers LTI 156970-72, admitted as trial exhibit PTX-906.

20. Attached hereto as Exhibit 19 is a true and correct copy of pages from the Facebook Developer Wiki, bearing Bates number LTI 156973, admitted as trial exhibit PTX-907.

21. Attached hereto as Exhibit 20 is a true and correct copy of pages from the Facebook Developer Wiki, bearing Bates numbers LTI 156982-87, admitted as trial exhibit PTX-911.

22. Attached hereto as Exhibit 21 is a true and correct copy of excerpts from the transcript of the July 16, 2010 Pretrial Hearing.

23. Attached hereto as Exhibit 22 is a true and correct copy of U.S. Patent No 6,236,994, admitted as trial exhibit DTX 0919.

24. Attached hereto as Exhibit 23 is a true and correct copy of iManage DeskSite 6.0 User Reference Manual, admitted as trial exhibit DTX 0925E.

25. Attached hereto as Exhibit 24 is a true and correct copy of European Patent Application EP 1 087 306 A2, admitted as trial exhibit DTX 0922.

26. Attached hereto as Exhibit 25 is a true and correct copy of U.S. Patent No. 6,434,403, admitted as trial exhibit DTX 0608.

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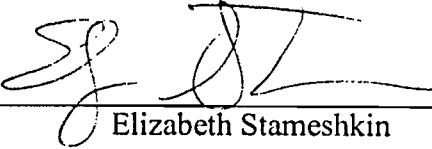
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27. Attached hereto as Exhibit 26 is a true and correct copy of U.S. Patent No. 7,590,934, admitted as trial exhibit DTX 0604.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 25, 2010 in Palo Alto, California.

  
Elizabeth Stameshkin