

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

LEADER TECHNOLOGIES, INC., )  
a Delaware corporation, )  
 )  
Plaintiff-Counterdefendant, ) Civil Action No. 08-862-LPS  
 )  
v. )  
 )  
FACEBOOK, INC., )  
a Delaware corporation, )  
 )  
Defendant-Counterclaimant. )

**DECLARATION OF YURIDIA CAIRE IN SUPPORT OF PLAINTIFF LEADER TECHNOLOGIES, INC.'S OPPOSITION TO DEFENDANT FACEBOOK, INC.'S MOTION FOR SUMMARY JUDGMENT OF INVALIDITY OF CLAIMS 1, 4, 7, 21, 23, 25, 31 AND 32 OF U.S. PATENT NO. 7,139,761**

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*Attorneys for Plaintiff and Counterdefendant  
Leader Technologies, Inc.*

Dated: September 20, 2010

I, Yuridia Caire, hereby declare as follows:

1. I am an attorney with the law firm King & Spalding LLP, counsel for Plaintiff Leader Technologies, Inc. I have personal knowledge of the facts set forth in this declaration and can testify competently to those facts. I make this declaration in support of Plaintiff Leader Technologies, Inc.'s Opposition to Defendant Facebook, Inc.'s Motion for Summary Judgment of Invalidity of Claims 1, 4, 7, 21, 23, 25, 31, and 32.

2. Attached hereto as Exhibit A is a true and correct copy of U.S. Patent No. 7,139,761 ("761 Patent").

3. Attached hereto as Exhibit B is a true and correct copy of the Notice of Allowability from the prosecution history of the '761 Patent, dated August 15, 2006.

4. Attached hereto as Exhibit C is a true and correct copy of pages 14-16 from the Expert Report of Saul Greenberg, served on April 8, 2010.


5. Attached hereto as Exhibit D is a true and correct copy of pages 5-15 from the Expert Report of Michael Kearns, served on April 22, 2010.

6. Attached hereto as Exhibit E is a true and correct copy of pages 6-7 from the Expert Report of Giovanni Vigna, served on April 8, 2010.

7. Attached hereto as Exhibit F is a true and correct copy of pages 4-5 from the Expert Report of James Herbsleb, served on April 8, 2010.

8. Attached hereto as Exhibit G is a true and correct copy of pages 299-305, 541-42, 720, 741-42, 991, 1404-06, 1579-81, 1613-14, 1752-53, 1776-79 from the Transcripts of Trial Proceedings.

I declare under penalty of perjury under the laws of the State of California and the United States that each of the above statements is true and correct. Executed on September 20, 2010 in Redwood Shores, California.

  
\_\_\_\_\_  
Yuridia Caire

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

**CERTIFICATE OF SERVICE**

I, Philip A. Rovner, hereby certify that on September 20, 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.

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I hereby certify that on September 20, 2010 I have sent by E-mail the foregoing document to the following non-registered participants:

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