

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TIMELINES, INC.	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.: 11 CV 6867
	)	
FACEBOOK, INC.	)	HONORABLE JOHN W. DARRAH
	)	
Defendant.	)	

**DECLARATION OF BRENDAN J. HUGHES IN SUPPORT OF  
DEFENDANT FACEBOOK, INC.'S MOTION *IN LIMINE* NO. 2: TO EXCLUDE  
EVIDENCE, ARGUMENT, AND TESTIMONY REGARDING FACEBOOK, INC.'S  
TEMPORARY REDIRECTION OF PLAINTIFF'S FACEBOOK PAGE**

I, Brendan J. Hughes, declare:

1. I am an associate with the law firm Cooley LLP, counsel for Defendant Facebook, Inc. ("Facebook") in connection with the above-titled action. I submit this declaration in support of Facebook's Motion *in Limine* No. 2: To Exclude Evidence, Argument, or Testimony Regarding Facebook, Inc.'s Temporary Redirection of Plaintiff's Facebook Page ("Motion"). I make this declaration upon personal knowledge and, if called and sworn as a witness, I could and would testify as to the matters set forth herein.

2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the deposition transcript of Samuel Lessin, dated September 2012 (**Confidential**).

3. Attached hereto as Exhibit B is a true and correct copy of an excerpt from an email string from Matt Brown regarding New Profile with Timeline Landing/Marketing Page, dated September 21, 2011, bearing Bates Nos. FB-TL00002142, 2147-2148 (**Highly Confidential – Outside Counsel Only**).

I declare under penalty of perjury that the foregoing statements are true and correct.

Executed in Washington, D.C. this 8th day of April, 2013.

/s/ Brendan J. Hughes  
Brendan J. Hughes (*pro hac vice*)  
COOLEY LLP  
1299 Pennsylvania Avenue, NW  
Suite 700  
Washington, DC 20004-2400  
Phone: (202) 842-7800  
Fax: (202) 842-7899  
Email: bhughes@cooley.com

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that he served the foregoing **DECLARATION OF BRENDAN J. HUGHES IN SUPPORT OF DEFENDANT FACEBOOK, INC.'S MOTION *IN LIMINE* NO. 2: TO EXCLUDE EVIDENCE, ARGUMENT, OR TESTIMONY REGARDING FACEBOOK, INC.'S TEMPORARY REDIRECTION OF PLAINTIFF'S FACEBOOK PAGE** by means of the Court's CM/ECF System, which causes a true and correct copy of the same to be served electronically on all CM/ECF registered counsel of record, on April 8, 2013.

Dated: April 8, 2013

/s/ Brendan J. Hughes  
Brendan J. Hughes (*pro hac vice*)  
COOLEY LLP  
1299 Pennsylvania Avenue, NW  
Suite 700  
Washington, DC 20004-2400  
Phone: (202) 842-7800  
Fax: (202) 842-7899  
Email: bhughes@cooley.com

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