

**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. 5**

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. 5: To Exclude Evidence, Testimony, and Argument Relating To Facebook, Inc.’s Overall Financial Condition and Net Worth. 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 are true and correct copies of excerpts from the deposition transcript of Brian Hand, dated September 20, 2012.

3. Attached hereto as Exhibit B is a true and correct copy of the Expert Report of David A. Haas, dated September 27, 2012 (**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*)  
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**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. 5** 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*

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Brendan J. Hughes (*pro hac vice*)

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