

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

FACEBOOK, INC.,

Plaintiff,

v.

PHOENIX MEDIA/COMMUNICATIONS
GROUP, INC., PEOPLE2PEOPLE GROUP,
INC., TELE-PUBLISHING, INC., AND FNX
BROADCASTING LLC,

Defendants.

C.A. No. 1:10-cv-11917-DPW

JURY TRIAL DEMANDED

**DECLARATION OF ARUN K. GOEL IN SUPPORT OF DEFENDANTS' PHOENIX
MEDIA/COMMUNICATIONS GROUP, INC., PEOPLE2PEOPLE GROUP, INC., AND
FNX BROADCASTING LLC'S OPENING CLAIM CONSTRUCTION BRIEF**

I, Arun K. Goel, declare:

1. I am an attorney with Mintz, Levin, Cohn, Ferris, Glovsky, and Popeo, P.C. of counsel in this action for Defendants Phoenix Media/Communications Group, Inc., People2PeopleGroup, Inc., and FNX Broadcasting LLC ("Defendants"). I make this declaration in support of Defendants' Opening Claim Construction Brief. 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 A is a true and correct copy of excerpts from the prosecution history of United States Patent No. 6,199,157 (the "'157 Patent") produced by Facebook in this case.

3. Attached hereto as Exhibit B is a true and correct copy of the '157 Patent.

4. Attached hereto as Exhibit C is a true and correct copy of excerpts from Plaintiff Facebook, Inc.'s Opening Claim Construction Brief Regarding U.S. Patent 6,199,157 in *Wireless Ink Corp. v. Facebook et al.*, Case No. 11 Civ. 1751 (PKC) (S.D.N.Y.), which was produced by Facebook in this case.

5. Attached hereto as Exhibit D is a true and correct copy of excerpts from the Declaration in Support of Facebook, Inc.'s Opening Claim Construction Brief Regarding U.S. Patent 6,199,157 in *Wireless Ink Corp. v. Facebook et al.*, Case No. 11 Civ. 1751 (PKC) (S.D.N.Y.), which was produced by Facebook in this case.

6. Attached hereto as Exhibit E is a true and correct copy of excerpts from Plaintiff Facebook, Inc.'s Opposition to Wireless Ink Corp.'s Opening Claim Construction Brief Regarding U.S. Patent 6,199,157 in *Wireless Ink Corp. v. Facebook et al.*, Case No. 11 Civ. 1751 (PKC) (S.D.N.Y.), which was produced by Facebook in this case.

7. Attached hereto as Exhibit F is a true and correct copy of excerpts from a transcript from a Markman hearing held in *Wireless Ink Corp. v. Facebook et al.*, Case No. 11 Civ. 1751 (PKC) (S.D.N.Y.), which was produced by Facebook in this case.

8. Attached hereto as Exhibit G is a true and correct copy of United States Patent No. 6,314,458.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 31, 2013 in San Diego, California.

/s/ Arun K. Goel
Arun K. Goel

CERTIFICATE OF SERVICE

I, H. Joseph Hameline, hereby certify that pursuant to Local Rule 5.4(C), this document has been filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF). For those parties indicated as non-registered participants, if any, a paper copy will be sent by facsimile and/or U.S. First Class Mail on January 31, 2013

/s/ H. Joseph Hameline

H. Joseph Hameline