

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

FACEBOOK, INC.

Plaintiff,

v.

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

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

Defendants.

**DECLARATION OF JAVIER TORRES  
IN SUPPORT OF PLAINTIFF  
FACEBOOK, INC.'S OPENING CLAIM CONSTRUCTION BRIEF**

I, Javier Torres, declare as follows:

1. I am an attorney at the law firm of Cooley LLP. I represent Facebook in the above captioned matter and have been admitted *pro hac vice* to this Court. I make this declaration in support of Facebook's Opening Claim Construction Brief.

2. Attached as **Exhibit A** is a true and correct copy of U.S. Patent No. 6,199,157 ("the '157 patent").

3. Attached as **Exhibit B** is a true and correct copy of U.S. Patent No. 6,314,458 ("the '458 patent").

4. Attached as **Exhibit C** is a true and correct copy of the November 17, 2011 Markman hearing transcript in the case *Wireless Ink Corp. v. Facebook, Inc.*, No. 11-CIV-1751 (S.D.N.Y.).

5. Attached as **Exhibit D** is a true and correct copy of definitions provided in Merriam-Webster's Collegiate Dictionary Tenth Edition, copyright 1998.

6. Attached as **Exhibit E** is a true and correct copy of definitions provided in the Collins English Dictionary, Fourth Edition, copyright 1998.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 31, 2013 in Palo Alto, CA.

*/s/ Javier Torres*  
Javier Torres

