## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

FACEBOOK, INC.,	)	
	)	(
Plaintiff,	)	
	)	
V.	)	
	)	
PHOENIX MEDIA/COMMUNICATIONS	)	
GROUP, INC., PEOPLE2PEOPLE GROUP	',)	
INC., TELE-PUBLISHING, INC., AND	)	
FNX BROADCASTING LLC,	)	
	)	
Defendants.	)	

Case No. 10-cv-11917-DPW

## **DECLARATION OF T. CHRISTOPHER DONNELLY**

I, T. Christopher Donnelly, state as follows:

1. I am a partner in the law firm of Donnelly, Conroy and Gelhaar LLP. I am

counsel for defendants Phoenix Media/Communications Group, Inc. ("PMC") and

People2People Group, Inc. ("P2P") in the above-captioned action. I have personal knowledge of the matters stated herein.

2. Attached hereto as Exhibit A is a copy of United States Patent No. 6,199,157

("the '157 patent"), entitled "System, Method and Medium for Managing Information."

3. Attached hereto as Exhibit B is a copy of an article entitled "Clarifying Search: A User-Interface Framework for Text Searches" that indicates publication in the January 1997 issue of D-Lib Magazine.

4. Attached hereto as Exhibit C is a copy of an article dated February 1996 entitled "Alta Vista vs. Lycos." 5. Attached hereto as Exhibit D is a copy of an article dated 1997 entitled

"HyperSQL: Web-based Query Interfaces for Biological Databases."

6. [redacted]

I declare under the penalty of perjury that the foregoing is true and correct. Executed on July 29, 2011.

## <u>/s/ T. Christopher Donnelly</u> T. Christopher Donnelly

## **CERTIFICATE OF SERVICE**

I, T. Christopher Donnelly, hereby certify that on this 29th day of July, 2011, I electronically filed the foregoing Declaration with the Clerk of Court using the CM/ECF system, which will send notification of such filing(s) to all counsel of record.

<u>/s/ T. Christopher Donnelly</u> T. Christopher Donnelly