

**CERTIFICATE OF SERVICE**

I, Jeffrey S. Jacobson, a member of the firm Debevoise & Plimpton LLP, attorneys for the defendant MySpace, Inc., herein, certify:

I am over eighteen (18) years of age. On February 11, 2011, I advised the counsel of record for Plaintiff Cory Hubbard identified below, in writing, sent by electronic mail, of MySpace's intent to seek sanctions against counsel pursuant to Federal Rule of Civil Procedure 11 unless they withdrew Hubbard's complaint, which MySpace considers to be unwarranted by existing interpretations of controlling law or any nonfrivolous argument for extending, modifying or reversing it. Hubbard's counsel subsequently filed an amended complaint that dropped five of Hubbard's original six causes of action, but persisted in the sixth, which MySpace contends is equally baseless.

On March 4, 2011, I served on the below-identified counsel, again by electronic mail, a draft memorandum of law in support of our request that sanctions be imposed. Hubbard's counsel did not withdraw Hubbard's amended complaint. In a memorandum of law Hubbard's counsel filed with the Court on March 17, 2011, they acknowledged MySpace's intent to seek Rule 11 sanctions but stated their intent to proceed with the case.

The counsel of record for Hubbard we served are:

Jeffrey M. Norton  
Harwood Feffer LLP  
488 Madison Avenue  
New York, New York 10022  
jnorton@hfesq.com

Joshua A. Millican  
Lisa T. Millican  
The Grant Building, Suite 607  
44 Broad Street, N.W.  
Atlanta, Georgia 30303  
joshua.millican@lawofficepc.com  
lisa.millican@lawofficepc.com

Pursuant to 28 U.S.C. § 1746, I certify under the penalty of perjury that the foregoing is true and correct.

Executed on March 28, 2011.

/s/ Jeffrey S. Jacobson  
Jeffrey S. Jacobson