

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

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PAUL D. CEGLIA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No. 1:10-cv-00569-
	:	RJA
	:	
MARK ELLIOT ZUCKERBERG and	:	
FACEBOOK, INC.,	:	
	:	
Defendants.	:	
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REDACTED DECLARATION OF NATHAN A. SHAMAN

I, Nathan A. Shaman, Esq. submit this Declaration in support of Plaintiff’s Motion to Compel Defendant Zuckerberg’s Compliance with the Court’s Order of July 1, 2011 (Motion to Compel) and hereby declare:

1. I am an attorney licensed to practice law in the State of California. I am an associate attorney with Jeffrey A. Lake, A.P.C., counsel of record for Plaintiff Paul D. Ceglia in the above-captioned matter. I make this declaration based upon personal knowledge.

THE ZUCKERBERG EMAILS

2. On August 3, 2011, I sent a letter to Defendants’ counsel Orin Snyder requesting that Defendants produce the emails from Defendant Zuckerberg by August 7, 2011 at 5:00 p.m. EST. A true and correct copy of that letter is attached hereto as Exhibit A.

3. That same day, I received a non-responsive reply letter from Mr. Snyder. A true and correct copy of that letter is attached hereto as Exhibit B.

4. On August 4, 2011, I sent another letter to Mr. Snyder again offering an extension until August 7, 2011 and stating that Plaintiff would withdraw his Motion to Compel if

Defendants turned over the emails. A true and correct copy of that letter is attached hereto as Exhibit C.

5. That same day, I received yet another non-responsive reply letter from Mr. Snyder. A true and correct copy of that letter is attached hereto as Exhibit D.

6. On August 8, 2011, I sent another letter to Mr. Snyder offering Defendants one last chance to produce the emails despite expiration of the extension. A true and correct copy of that letter is attached hereto as Exhibit E.

7. That same day, I received a reply letter from Mr. Snyder in which Defendants again refused to produce the Zuckerberg emails. A true and correct copy of that letter is attached hereto as Exhibit F.

THE PRIVILEGE LOG

8. On August 2, 2011 at 1:37 p.m. EST, I emailed Plaintiff's Privilege Log to Defendants' counsel, Alexander H. Southwell. A true and correct copy of that email is attached hereto as Exhibit G.

THE PROTECTIVE ORDER

9. [REDACTED]

I hereby certify and declare under penalty of perjury that the foregoing is true and accurate.

DATED: August 10, 2011

s/ Nathan A. Shaman