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.	: : x	

DECLARATION OF NATHAN A. SHAMAN

I, Nathan A. Shaman, Esq. submit this Declaration in support of Plaintiff's Motion to Stay Discovery (Motion to Stay) 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.

2. On August 18, 2011, the Court issued an Order Denying Plaintiff's Motion to Compel and Granting in Part and Denying in Part Defendants' Cross-motion to Compel (Doc. No. 117) (Order).

3. Paragraph 2 of the Order requires that, on or before August 29, 2011, Plaintiff identify via declaration voluminous electronic documents and electronic media. (*See id.* at 1-2.)

4. Paragraph 3 of the Order requires that, on or before August 29, 2011, Plaintiff produce all electronic documents and electronic media identified pursuant to paragraph 2. (*See id.* at 2-3.)

5. In order to comply fully with this request, I sent fourteen (14) letters to various law firms and experts whom have been involved with this case, requesting that they produce all items, as described in paragraph 2 of the Order, in their possession, custody, or control. True and correct copies of all such letters are attached hereto as Exhibit A.

6. As of today, I have received responses from only seven (7) of the law firms and experts I contacted.

7. Plaintiff's expert John Paul Osborn has informed me that he will not be available to provide Plaintiff with any responsive documents until August 29, 2011, the date by which the Order requires compliance.

8. Upon information and belief, each of Plaintiff's law firms and experts, former and current, are likely to have a multitude of responsive electronic documents and it will require enormous efforts to comb through those documents to remove privileged, irrelevant matter. As such, it is highly improbable that Plaintiff will be able to timely comply with the August 18, 2011 Order.

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

DATED: August 22, 2011

s/ Nathan A. Shaman

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