

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

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PAUL D. CEGLIA,

Plaintiff,

v.

MARK ELLIOT ZUCKERBERG and
FACEBOOK, INC.,

Defendants.
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Civil Action No. 1:10-cv-00569-RJA

**DECLARATION OF
GERALD M. LAPORTE**

I, Gerald M. LaPorte, am competent to testify to the matters set forth herein and make this declaration of my own personal knowledge and belief.

1. I respectfully submit this declaration in support of Defendants' Third Motion to Compel and for Other Relief

2. I am currently a Forensic Chemist and Document Dating Specialist with Riley Welch LaPorte & Associates Forensic Laboratories, located in Lansing, Michigan. At Riley Welch LaPorte & Associates, I engage in consultation, examination, research and testimony relating to questioned documents, including analysis of ink, paper and toner. I have conducted numerous instructional courses, lectures, and presentations for private associations, universities, and United States and international government agencies. Attached as Exhibit A is a true and correct copy of my Curriculum Vitae.

3. I am a member of the American Academy of Forensic Sciences, the Mid-Atlantic Association of Forensic Scientists, the American Society for Testing and Materials (ASTM), American Society of Questioned Document Examiners (ASQDE), a contributing member and technical contact of the Scientific Working Group for Questioned Document Examiners, and a contributing member in the European Document Experts Working Group (EDEWG) and the

International Collaboration for Ink Dating (INCID). I was named "2005 Forensic Scientist of the Year" by the Mid-Atlantic Association of Forensic Scientists. I received the United States Attorney's Office Eastern District of Virginia "Law Enforcement Public Service Award."

4. I have over 18 years of experience in the field of forensic science and over 10 years of experience performing physical and chemical examinations on a variety of documents to determine how they were produced and whether they are authentic. I trained with the United States Secret Service in the field of questioned document examination, specializing in the area of ink and paper analysis. I served in the Secret Service for 8 years, first as a Document Analyst (2001-2005), then as a Senior Document Analyst (2005-2007), and finally as the Chief Research Forensic Chemist (2007-2009).

5. I have examined thousands of documents and testified as an expert witness in State, Federal, and International courts in cases that involved fraudulent and counterfeit documents, false claims, last wills and testaments, threatening letters, disputed claims, and medical malpractice.

6. I participated in Defendants' inspection of the Hard-Copy Documents on Saturday, July 16 and Sunday, July 17, 2011, and on Saturday, August 27, 2011.

7. Prior to conducting a full examination of a questioned document, it is standard practice for forensic document examiners to capture accurate raw images of the questioned document in its "as-is" condition.

8. Raw image formats typically include formats such as the Joint Photographic Experts Group format ("JPEG"), Tagged Image File Format ("TIFF"), Bitmap Image File format ("BMP"), and Graphics Interchange Format ("GIF").

9. It is typical for a forensic document examiner to take such images as scans and/or as digital photographs.

10. It is typical for a forensic document examiner to take such images at a resolution of 600 dots per inch or higher, and to take images of both the front and the back of the document.

11. A Photoshop Document ("PSD") file is a file created in Adobe Photoshop or similar Adobe software program, such as Adobe Photoshop Elements.

12. Adobe software programs like Photoshop or Photo Elements can be used to manipulate colors and contrast on an image, and to add and remove image layers, all of which may affect the appearance of a digital image. These programs can also be used to edit images in many other ways, including creating a composite image from several images, and adjusting aspects such as color and contrast of specific areas of an image.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 12th day of October 2011, in Vienna, Virginia

A large, stylized handwritten signature in black ink, appearing to read 'Gerald M. LaPorte', written over a horizontal line.

Gerald M. LaPorte, M.S.F.S, B.Sc.