

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

SUPPLEMENTAL DECLARATION OF PAUL D. CEGLIA

I, Paul D. Ceglia, submit this Declaration in compliance with the Court's August 18, 2011 Order (Doc. No. 117) and hereby declare:

1. I make this declaration based upon personal knowledge.

CATEGORY (A)

2. The follow list is organized by the name of the law firm or expert firm at which the files listed are located.

Jeffrey A. Lake, A.P.C.

3. Location: 835 5th Avenue, Suite 200A, San Diego, California 92101

4. It is my understanding that Lake, A.P.C. is in possession of copies of all of the documents listed below, which are being produced along with this declaration.

Paul Argentieri & Associates

5. Location: 188 Main Street, Hornell, New York 14843

6. Scan of page 1 of "'Work for Hire' Contract" executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: "Zuckerberg_Contract_page1.tif".

7. Scan of page 2 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “Zuckerberg_Contract_page2.tif”.

Connors & Vilardo, LLP

8. Location: 424 Main Street, Buffalo, New York 14202

9. PDF scan of copy of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, that was attached to the original Complaint, filename: “Contract.pdf”.

10. PDF compilation, filename: “Ceglia.pdf”, containing (Note: some pages have been redacted because they are irrelevant, proprietary, and/or not within the scope of Category (A) of the Court’s August 18, 2011 Order):

- a. At pages 1-2: Scanned version attached to the complaint of the “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003.
- b. At pages 3-4: Scanned version attached to the complaint of the “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003.

Kasowitz, Benson, Torres & Friedman LLP

11. Location: 1633 Broadway, New York, New York 10019.

12. Scanned version attached to the complaint of the “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “Lawsuit Overview.pdf”. Note: some pages have been redacted because they are irrelevant, proprietary, and/or not within the scope of Category (A) of the Court’s August 18, 2011 Order.

DLA Piper

13. Location: Various virtual and physical locations.

14. It is my understanding that DLA Piper has in its possession electronic copies or images of the “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003. (*See* Exhibit A to Declaration of Nathan Shaman, dated August 29, 2011.)

15. It is my further understanding that these items were obtained previously by Stroz Friedberg by copying my electronic media in the possession of Project Leadership Associates. (*See id.*)

16. It is my further understanding that identification and production of all items responsive to Category (A) that are in the possession of DLA Piper would require an enormous expenditure of time and money, and only would lead to the identification and production of items already being produced with this declaration.

Edelson McGuire, LLP

17. Locations: 350 North LaSalle, 13th Floor, Chicago, Illinois 60654; 5715 Firestone Court, Sarasota, Florida 34238.

18. Scan of portion of page 2 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “VSC Printout001.pdf”.

19. Scan of portion of page 1 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “VSC Printout002.pdf”.

20. Scan of portion of page 1 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “VSC Printout003.pdf”.

21. Scan of portion of page 1 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “VSC Printout004.pdf”.

22. Scan of portion of page 2 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “VSC Printout005.pdf”.

23. PowerPoint containing scan of portions of pages 1 and 2 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “facebook signatures.pptx”.

24. PowerPoint containing scan of portions of pages 1 and 2 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, original filename: “facebook signatures.pptx”, new filename: “facebook signatures(2).pptx”.

Aginsky Forensic Document Dating Laboratory, Inc.

25. Location: 6280 Heathfield Drive, East Lansing, Michigan 48823

26. Scan of page 1 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “WorkForHireContract_page1.psd”.

27. Scan of page 2 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “WorkForHireContract_page2.psd”.

Blanco & Associates, Inc.

28. Location: 655 North Central Avenue, 17th Floor, Glendale, California 91203.

29. It is my understanding that Blanco & Associates may have in its possession items that are responsive to Category (A). (*See* Exhibit C to Declaration of Nathan Shaman, dated August 29, 2011.)

30. It is my further understanding that Blanco & Associates has refused to assist my compliance with the August 18, 2011 Order due to an outstanding balance. (*See id.*)

31. It is my further understanding that identification and production of all responsive items in the possession of Blanco & Associates would require an enormous expenditure of time

and money, and only would lead to the identification and production of items already being produced with this declaration.

Capsicum Group, LLC

32. Location: The Cira Centre, 2929 Arch Street, Suite 1525, Philadelphia, Pennsylvania 19104.

33. It is my understanding that Capsicum may have in its possession items that are responsive to Category (A). (*See* Exhibit D to Declaration of Nathan Shaman, dated August 29, 2011.)

34. It is my further understanding that identification and production of all responsive items in the possession of Capsicum would require an enormous expenditure of time and money, and only would lead to the identification and production of items already being produced with this declaration.

Osborn & Son

35. Location: 1273 Bound Brook Road, Suite 15, Middlesex, New Jersey 08846

36. It is my understanding that Osborn & Son may have in its possession items that are responsive to Category (A).

37. It is my further understanding that John Paul Osborn has been unavailable to assist me in my efforts thus far.

Project Leadership Associates

38. Location: 120 South LaSalle, Suite 1200, Chicago, Illinois 60603

39. It is my understanding that PLA may have in its possession items that are responsive to Category (A). (*See* Exhibit E to Declaration of Nathan Shaman, dated August 29, 2011.)

40. It is my further understanding that identification and production of all responsive items in the possession of PLA would require an enormous expenditure of time and money, and only would lead to the identification and production of items already being produced with this declaration. (*See id.*)

Speckin Forensic Laboratories

41. Location: 2400 Science Parkway, Suite 200, Okemos, Michigan 48864

42. Scan of portion of page 2 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “VSC Printout001.pdf”.

43. Scan of portion of page 1 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “VSC Printout002.pdf”.

44. Scan of portion of page 1 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “VSC Printout003.pdf”.

45. Scan of portion of page 1 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “VSC Printout004.pdf”.

46. Scan of portion of page 2 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “VSC Printout005.pdf”.

Stewart Forensic Consultants, LLC

47. Location: 793A East Foothill Boulevard, Suite 200, San Luis Obispo, California 93405

48. Scan of faxed copy of “StreetFax Back-End Technical Specification” signed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “Zuckerberg Street Fax Specifications.pdf”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

49. Scan of page 1 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “Zuckerberg Contract page1.tif”.
50. Scan of page 2 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “Zuckerberg Contract page2.tif”.
51. Scan of page 1 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “Untitled-1.tif”.
52. Scan of back of page 1 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “Untitled-2.tif”.
53. Scan of page 2 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “Untitled-3.tif”.
54. Scan of back of page 2 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “Untitled-4.tif”.
55. Scan of page 1 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “q1.tif”.
56. Scan of page 2 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “q1_0002.tif”.
57. PDF compilation containing Items 44-45, filename: “q1_0004.pdf”. Note: some pages have been redacted because they are irrelevant, proprietary, and/or not within the scope of Category (A) of the Court’s August 18, 2011 Order.
58. Scan of portion of page 2 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “051.tif”.
59. Scan of portion of page 2 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “052.tif”.

60. Scan of portion of page 2 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “053.tif”.

61. Scan of portion of page 1 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “054.tif”.

62. Scan of portion of page 1 of “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “055.tif”.

Sylint Group, Inc.

63. Location: 240 N. Washington Boulevard, Suite 240, Sarasota, Florida 34236

64. It is my understanding that Sylint may have in its possession items that are responsive to Category (A). (*See* Exhibit B to Declaration of Nathan Shaman, dated August 29, 2011.)

65. It is my further understanding that all of these items are contained on the forensic images already provided to Stroz Friedberg. (*See id.*)

66. It is my further understanding that identification and production of all responsive items in the possession of Sylint would require an enormous expenditure of time and money, and only would lead to the identification and production of items already produced to Stroz Friedberg.

CATEGORY (B)

Jeffrey A. Lake, A.P.C.

67. Location: 835 5th Avenue, Suite 200A, San Diego, California 92101

68. It is my understanding that Lake, A.P.C. is in possession of copies of all of the documents listed below, which are being produced along with this declaration.

Paul Argentieri & Associates

69. Location: 188 Main Street, Hornell, New York 14843
70. Microsoft Word document entitled, “‘Work for Hire’ Contract,” filename: “Work for Hire ContractMZ.doc”.
71. Microsoft Word document entitled, “Street Fax,” filename: “work for hire SF template.doc”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

Connors & Vilardo, LLP

72. Location: 424 Main Street, Buffalo, New York 14202
73. PDF compilation, filename: “Ceglia.pdf”, containing (Note: some pages have been redacted because they are irrelevant, proprietary, and/or not within the scope of Category (B) of the Court’s August 18, 2011 Order):
- a. At pages 5-10: Scan of faxed copy of “StreetFax Back-End Technical Specification” signed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
 - b. At pages 11-16: Scan of faxed copy of “StreetFax Back-End Technical Specification” signed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
 - c. At pages 17-22: Scan of “StreetFax Back-End Technical Specification” signed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

- d. At pages 23-25: Scan of “Street Fax” contract apparently executed by Randy Kato on May 5, 2003. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- e. At page 26: Scan of unexecuted “Agreed upon Contract Points for StreetFax, Inc.” Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- f. At page 27: Scan of unexecuted “Confidentiality Agreement”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- g. At pages 28-31: Scan of unexecuted “Exhibit B Sales Representative Contract”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- h. At page 33: Scan of untitled document apparently executed by Paul Ceglia on November 20, 2003, Sandor Sienkiewicz on an unknown date, and Teddy Sienkiewicz on November 20, 2003. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- i. At page 34: Scan of untitled document apparently executed by Paul Ceglia on November 20, 2003, Sandor Sienkiewicz on an unknown date, and Teddy Sienkiewicz on November 20, 2003. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- j. At page 35: Scan of untitled, unexecuted document. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

- k. At page 36: Scan of untitled document apparently executed by Paul Ceglia on November 20, 2003, Sandor Sienkiewicz on an unknown date, and Teddy Sienkiewicz on November 20, 2003. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- l. At pages 37 - 40: Scan of "Sales Representative Agreement" apparently executed by Paul Ceglia on November 10, 2003 and [illegible] on November 10, 2003. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- m. At page 41: Scan of page 1 of "Sales Representative Agreement". Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- n. At pages 42-45: Scan of unexecuted "Exhibit B Sales Representative Contract". Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- o. At pages 46-47: Scan of unexecuted "Confidentiality Agreement". Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- p. At pages 63-70: Scan of pages 1-8 of "Operating Agreement for StreetFax LLC". Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- q. At pages 71-74: Scan of unexecuted "Exhibit B Sales Representative Contract". Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

- r. At pages 76-86: Scan of “Operating Agreement for StreetFax LLC” apparently executed by Karin Petersen on November 20, 2003 and Teddy Sienkiewicz on November 20, 2003. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- s. At pages 87-88: Scan of unexecuted “Loan Agreement”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- t. At pages 89-90: Scan of unexecuted “StreetFax LLC. Promissory Note”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- u. At pages 91-96: Scan of unexecuted “Operating Agreement for StreetFax LLC”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- v. At pages 97-100: Scan of unexecuted “Exhibit B Sales Representative Contract”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- w. At pages 101-102: Scan of unexecuted “Confidentiality Agreement”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- x. At pages 118-125: Scan of pages 1-8 of “Operating Agreement for StreetFax LLC”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

- y. At pages 126-129: Scan of unexecuted “Exhibit B Sales Representative Contract”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- z. At pages 131-141: Scan of “Operating Agreement for StreetFax LLC” apparently executed by Karin Petersen on November 20, 2003 and Teddy Sienkiewicz on November 20, 2003. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- aa. At pages 142-143: Scan of unexecuted “Loan Agreement”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- bb. At pages 144-145: Scan of unexecuted “StreetFax LLC. Promissory Note”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- cc. At pages 146-151: Scan of unexecuted “Operating Agreement for StreetFax LLC”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- dd. At page 152: Scan of “Agreed upon Contract Points for Kapasate, Inc.” apparently executed by Paul Ceglia, Teddy Sienkiewicz, Karin Petersen, and Sandor Sienkewicz, and notarized by Diane M. Galloway. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- ee. At pages 153-155: Scan of “Acknowledgement Form for Consultants/Independent Contracts, Temporary and Leased Workers”

apparently executed by Sandor Sienkiewicz on February 19, 2003 and apparently witnessed by Paul Ceglia on February 19, 2003. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

ff. At pages 156-158: Scan of "Acknowledgement Form for Consultants/Independent Contracts, Temporary and Leased Workers" apparently executed by Teddy Sienkiewicz on February 19, 2003 and apparently witnessed by Paul Ceglia on February 19, 2003. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

gg. At page 159: Scan of "Agreed upon Contract Points for Kapasate, Inc." apparently executed by Paul Ceglia, Teddy Sienkiewicz, Karin Petersen, and Sandor Sienkiewicz, and notarized by Diane M. Galloway. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

hh. At page 160: Scan of "Release Form" with printed name of Teddy Sienkiewicz. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

ii. At pages 160-161: Scan of handwritten "Agreed upon Contract Points for Kapasate". Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

jj. At page 162: Scan of email from paulceglia@msn.com to tsienkiewicz@tmail.com, dated December 15, 2003, containing text of

“Confidentiality Agreement”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

kk. At pages 163-165: Scan of pages 2-4 of unexecuted “Exhibit B Sales Representative Contract”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

ll. At pages 167-170: Scan of “Consulting/Sales Representative Agreement” apparently executed by Paul Ceglia on December 29, 2003 and William Schellinger on December 20, 2003. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

mm. At pages 172-173: Scan of “Agreed upon Contract Points for StreetFax LLC.” apparently executed by Paul Ceglia, Teddy Sienkiewicz, Karin Petersen, and Sandor Sienkiewicz, and apparently witnessed by Julie Horvath-Krol and [illegible] Dylewska. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

nn. At page 174: Scan of untitled document apparently executed by Paul Ceglia on November 4, 2004 and Kala Pierson on February 11, 2004. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

oo. At page 205: Scan of unexecuted “Release Form”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

- pp. At page 206: Scan of unexecuted "Release Form". Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- qq. At page 207: Scan of unexecuted "Release Form" with printed name of Sandor Sienkiewicz and numerous interlineations. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- rr. At page 208-209: Scan of unexecuted "Acknowledgement Form for Consultants/Independent Contractors, Temporary and Leased Workers". Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- ss. At page 210: Scan of unexecuted "Release Form" with printed name of Teddy Sienkiewicz and numerous interlineations. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- tt. At page 211: Scan of "Release Form" with printed name of Teddy Sienkiewicz, and apparently signed by Teddy Sienkiewicz on February 15, 2003 and Paul Ceglia on February 15, 2003. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.
- uu. At page 212: Scan of "Release Form" with printed name of Sandor Sienkiewicz, and apparently signed by Sandor Sienkiewicz on February 14, 2003 and Paul Ceglia on February 14, 2003. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

vv. At page 213: Scan of last page of “applus.net Dedicated Server Terms and Conditions” apparently executed by Paul Ceglia on June 2, 2004. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

ww. At page 214: Scan of “applus.net Acceptable Use Policy” apparently executed by Paul Ceglia on June 2, 2004. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

xx. At page 215: Scan of different “applus.net Acceptable Use Policy” apparently executed by Paul Ceglia on June 2, 2004. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

yy. At page 216-217: Scan of “applus.net Dedicated Server Terms and Conditions” apparently executed by Paul Ceglia on June 2, 2004. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

Kasowitz, Benson, Torres & Friedman LLP

74. Location: 1633 Broadway, New York, New York 10019.

75. Scan of page 1 of purported “Street Fax” contract apparently executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “Scan0001.tif”.

76. Scan of page 2 of purported “Street Fax” contract apparently executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “Scan0002.tif”.

DLA Piper

77. Location: Various virtual and physical locations.

78. It is my understanding that DLA Piper has in its possession electronic versions of the “‘Work for Hire’ Contract” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003. (*See* Exhibit A to Declaration of Nathan Shaman, dated August 29, 2011.);

79. It is my further understanding that these items were obtained previously by Stroz Friedberg by copying my electronic media in the possession of Project Leadership Associates. (*See id.*)

80. It is my further understanding that identification and production of all items responsive to Category (B) that are in the possession of DLA Piper would require an enormous expenditure of time and money, and only would lead to the identification and production of items already being produced with this declaration.

Edelson McGuire, LLP

81. Locations: 350 North LaSalle, 13th Floor, Chicago, Illinois 60654; 5715 Firestone Court, Sarasota, Florida 34238.

82. Scan of page 1 of purported “Street Fax” contract apparently executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “Scan0001.tif”.

83. Scan of page 2 of purported “Street Fax” contract apparently executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “Scan0002.tif”.

Blanco & Associates, Inc.

84. Location: 655 North Central Avenue, 17th Floor, Glendale, California 91203.

85. It is my understanding that Blanco & Associates may have in its possession items that are responsive to Category (B). (*See* Exhibit C to Declaration of Nathan Shaman, dated August 29, 2011.)

86. It is my further understanding that Blanco & Associates has refused to assist my compliance with the August 18, 2011 Order due to an outstanding balance. (*See id.*)

87. It is my further understanding that identification and production of all responsive items in the possession of Blanco & Associates would require an enormous expenditure of time and money, and only would lead to the identification and production of items already being produced with this declaration.

Capsicum Group, LLC

88. Location: The Cira Centre, 2929 Arch Street, Suite 1525, Philadelphia, Pennsylvania 19104.

89. It is my understanding that Capsicum may have in its possession items that are responsive to Category (B). (*See* Exhibit D to Declaration of Nathan Shaman, dated August 29, 2011.)

90. It is my further understanding that identification and production of all responsive items in the possession of Capsicum would require an enormous expenditure of time and money, and only would lead to the identification and production of items already being produced with this declaration.

Project Leadership Associates

91. Location: 120 South LaSalle, Suite 1200, Chicago, Illinois 60603

92. It is my understanding that PLA may have in its possession items that are responsive to Category (B). (*See* Exhibit E to Declaration of Nathan Shaman, dated August 29, 2011.)

93. It is my further understanding that identification and production of all responsive items in the possession of PLA would require an enormous expenditure of time and money, and only would lead to the identification and production of items already being produced with this declaration. (*See id.*)

Stewart Forensic Consultants, LLC

94. Location: 793A East Foothill Boulevard, Suite 200, San Luis Obispo, California 93405

95. Scan of faxed copy of “StreetFax Back-End Technical Specification” signed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “Zuckerberg Street Fax Specifications.pdf”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

96. Scan of page 1 of “StreetFax Back-End Technical Specification” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “q2.tif”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

97. Scan of back of page 1 of “StreetFax Back-End Technical Specification” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “q2_0001.tif”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

98. Scan of page 2 of “StreetFax Back-End Technical Specification” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “q2_0002.tif”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

99. Scan of back of page 2 of “StreetFax Back-End Technical Specification” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “q2_0003.tif”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

100. Scan of page 3 of “StreetFax Back-End Technical Specification” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “q2_0004.tif”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

101. Scan of back of page 3 of “StreetFax Back-End Technical Specification” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “q2_0005.tif”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

102. Scan of page 4 of “StreetFax Back-End Technical Specification” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “q2_0006.tif”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

103. Scan of back of page 4 of “StreetFax Back-End Technical Specification” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “q2_0007.tif”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

104. Scan of page 5 of “StreetFax Back-End Technical Specification” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “q2_0008.tif”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

105. Scan of back of page 5 of “StreetFax Back-End Technical Specification” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “q2_0009.tif”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

106. Scan of page 6 of “StreetFax Back-End Technical Specification” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “q2_0010.tif”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

107. Scan of back of page 6 of “StreetFax Back-End Technical Specification” executed by Paul Ceglia and Mark Zuckerberg, dated April 28, 2003, filename: “q2_0011.tif”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

108. PDF compilation of Items 37-48, filename: “q2_0012.pdf”. Note: This document is hereby designated as confidential pursuant to the Joint Stipulated Protective Order.

Sylint Group, Inc.

109. Location: 240 N. Washington Boulevard, Suite 240, Sarasota, Florida 34236

110. It is my understanding that Sylint may have in its possession items that are responsive to Category (B). (*See Exhibit B to Declaration of Nathan Shaman, dated August 29, 2011.*)

111. It is my further understanding that all of these items are contained on the forensic images already provided to Stroz Friedberg. (*See id.*)

112. It is my further understanding that identification and production of all responsive items in the possession of Sylint would require an enormous expenditure of time and money, and only would lead to the identification and production of items already produced to Stroz Friedberg.

CATEGORY (C)

Jeffrey A. Lake, A.P.C.

113. Location: 835 5th Avenue, Suite 200A, San Diego, California 92101

114. It is my understanding that Lake, A.P.C. is in possession of copies of all of the documents listed below, which are being produced along with this declaration.

Kasowitz, Benson, Torres & Friedman LLP

115. Location: 1633 Broadway, New York, New York 10019.

116. Email from ceglia@adelphia.net to jkole@sidley.com, dated March 3, 2004, filename: "page 1 of 2 for Streetfax contract w mark.msg".

117. Email from ceglia@adelphia.net to jkole@sidley.com, dated March 3, 2004, filename: "2 of 2 for streetfax contract.msg".

DLA Piper

118. Location: Various virtual and physical locations.

119. It is my understanding that DLA Piper does not have in its possession electronic versions of any emails or purported emails by and among Mark Zuckerberg, myself and/or other persons associated with Street Fax. (*See Exhibit A to Declaration of Nathan Shaman, dated August 29, 2011.*)

Capsicum Group, LLC

120. Location: The Cira Centre, 2929 Arch Street, Suite 1525, Philadelphia, Pennsylvania 19104.

121. It is my understanding that Capsicum Group, LLC may have in its possession items that are responsive to Category (C). (*See Exhibit D to Declaration of Nathan Shaman, dated August 29, 2011.*)

122. It is my further understanding that identification and production of all responsive items in the possession of Capsicum Group, LLC would require an enormous expenditure of time and money, and only would lead to the identification and production of items already being produced with this declaration.

Project Leadership Associates

123. Location: 120 South LaSalle, Suite 1200, Chicago, Illinois 60603

124. It is my understanding that PLA may have in its possession items that are responsive to Category (C). (*See Exhibit E to Declaration of Nathan Shaman, dated August 29, 2011.*)

125. It is my further understanding that identification and production of all responsive items in the possession of PLA would require an enormous expenditure of time and money, and only would lead to the identification and production of items already being produced with this declaration. (*See id.*)

Sylint Group, Inc.

126. Location: 240 N. Washington Boulevard, Suite 240, Sarasota, Florida 34236

127. It is my understanding that Sylint may have in its possession items that are responsive to Category (C). (*See Exhibit B to Declaration of Nathan Shaman, dated August 29, 2011.*)

128. It is my further understanding that all of these items are contained on the forensic images already provided to Stroz Friedberg. (*See id.*)

129. It is my further understanding that identification and production of all responsive items in the possession of Sylint would require an enormous expenditure of time and money, and

only would lead to the identification and production of items already produced to Stroz Friedberg.

CATEGORY (D)

130. After a diligent search and a reasonable inquiry, I have not been able to locate any responsive items in my possession, custody, or control.

CATEGORY (E)

Gigaware USB Device, 20051942520C8D20CDB2&O

131. Upon information and belief, I was in possession of this media device in 2010.

132. Upon information and belief, the link files referenced in items 76-90 of the Stroz Friedberg Presumed Relevant Materials Log refer to files I copied to this media device in July 2010.

133. Furthermore, it is my understanding that the access dates for this media device correspond to the dates on which those link files were created on my Toshiba laptop because the drive was first accessed on the Toshiba on June 17, 2010 and later accessed on the Toshiba on September 16, 2010.

134. “Zuckerberg Contract page1.tif” was a scan of the first page of my “‘Work for Hire’ Contract” with Mark Zuckerberg that I made several days before the original complaint was filed. (*See* Declaration of Paul Argentieri, dated August 29, 2011.) Several copies of this file are being produced along with this declaration.

135. “Zuckerberg Contract page2.tif” was a scan of the second page of my “‘Work for Hire’ Contract” with Mark Zuckerberg that I made several days before the original complaint was filed. (*See id.*) Several copies of this file are being produced along with this declaration.

136. Upon information and belief, the files “DOC212.pdf,” “DOC213.pdf,” “DOC214.pdf,” “DOC215.pdf,” and “DOC221.pdf” were PDF files of documents related to (1) filings made prior to removal of this case to federal court or (2) filings from *Facebook, Inc. v. ConnectU, Inc.* (Civ. No. 07-01389, N.D. Cal.) and related litigation.

137. After a diligent search and reasonable inquiry of my attorneys, experts, and family, I am unable to locate this media device in my possession, custody, or control.

Maxtor 3200 USB Device 604010193447&0

138. It is my understanding that this media device was produced to Stroz Friedberg for inspection at the offices of Sylint Group, Inc. in Sarasota, Florida on July 15, 2011.

139. It is my further understanding that the internal identifier of this hard drive is 604010193447&0.

140. It is my further understanding that the external identifier, contained on the hard drive enclosure, is L42PMZBG.

141. In my declaration of July 15, 2011 (Doc. No. 88), I identified this hard drive by its external identifier, listed above.

SanDisk Cruzer Micro USB Device, 200524439016A86122A2&O

142. It is my understanding that this media device was first accessed on my Toshiba laptop on July 22, 2009 and later accessed on December 22, 2010.

143. It is my further understanding that there is a record of access to this device on my parents’ loose Seagate hard drive on September 29, 2010.

144. I do not recall using this media device, and after a diligent search and reasonable inquiry of my attorneys, experts, and family, I am unable to locate this media device in my possession, custody, or control.

USB 2.0 USB Flash Drive USB Device, 76562f5793a65e&o

145. The Presumed Relevant Materials Logs produced by Stroz Friedberg indicate that the only computer to which this media device was connected was my one of my parents' computers.

146. I do not recall using this media device, and after a diligent search and reasonable inquiry of my attorneys, experts, and family, I cannot locate it in my possession, custody, or control.

Ut165 USB2 FlashStorage USB Device, 00000000000069&0

147. It is my understanding that this device was first accessed by one of my parents' computers on May 5, 2010.

148. The Presumed Relevant Materials Logs produced by Stroz Friedberg indicate that the only computer to which this media device was connected was one of my parents' computers.

149. I do not recall using this media device, and after a diligent search and reasonable inquiry of my attorneys, experts, and family, I cannot locate it in my possession, custody, or control.

Kingston DataTraveler 2.0 USB Device, 5B8407000A4B&O

150. The Presumed Relevant Materials Logs produced by Stroz Friedberg indicate that the only computer to which this media device was connected was one of my parents' computers.

151. I do not recall using this media device, and after a diligent search and reasonable inquiry of my attorneys, experts, and family, I cannot locate it in my possession, custody, or control.

CATEGORY (F)

Sylint Group, Inc.

- 152. Location: 240 N. Washington Boulevard, Suite 240, Sarasota, Florida 34236
- 153. One (1) Seagate 120GB internal hard drive SN: 3JT1JQF6
- 154. One (1) Maxtor 300GB external USB drive SN: L42PMZBG
- 155. Five (5) 3.5" floppy disks
- 156. Twelve (12) CDs/DVDs
- 157. All of the above were produced for inspection on July 15, 2011.

Project Leadership Associates

- 158. Location: 120 South LaSalle, Suite 1200, Chicago, Illinois 60603
- 159. One (1) Toshiba laptop SN: 69500395Q
- 160. 169 3.5" floppy disks
- 161. 1,075 CDs/DVDs
- 162. An electronic image of one (1) Seagate 120GB internal hard drive SN: 3JT1JQF6
- 163. All of the above were produced for inspection on July 15, 2011, except the image of the Seagate hard drive, which was produced for inspection on July 18, 2011.

Carmen and Vera Ceglia

- 164. Location: Wellsville, New York
- 165. One (1) Compaq SR5000 computer SN: 3CR8190BXZ with Samsung hard drive, SN: S19JJ1DQ400135
- 166. One (1) Acer computer with Hitachi hard drive, SN: GEK834RBUWEP2A
- 167. The Compaq computer was produced for inspection on July 15, 2011.

168. The Acer computer was produced for inspection on July 19, 2011.

Paul Ceglia

169. Location: Ireland

170. An electronic image of one (1) Maxtor 300GB external USB drive SN: L42PMZBG

171. This image is an exact duplicate of the Maxtor hard drive produced for inspection on July 15, 2011 and therefore will not be produced. (*See* August 18, 2011 Order at 3, ¶ 3.)

CATEGORY (G)

172. The only items responsive to this Category are identified above under Category (E).

CERTIFICATION OF PRODUCTION

173. I hereby certify that all files, computers, and electronic media identified above are being produced to Defendants on August 29, 2011, with the exception of those files named in the Privilege Log produced with this declaration.

IDENTIFICATION OF EMAIL ACCOUNTS

Gmail

174. Email account: paulceglia@gmail.com

175. Password: [REDACTED]

MSN

176. Email account: paulceglia@msn.com

177. Password: [REDACTED]

Adelphia

178. I have not used, since 2003, an Adelphia.net email account that belongs to me.

179. The Adelphia.net account I used in the past belonged to my parents.

Tmail

180. Tmail was an email account provided by T-Mobile for use on the original T-Mobile Sidekick smart phone.

181. This account was accessible directly from the Sidekick.

182. I do not know how to access this account, and I have not used this account since 2005.

The Native Emails Attached to the Amended Complaint

183. I continue to certify that I performed a diligent search for and reasonable inquiry as to the native emails attached to the Amended Complaint, and I have produced all electronic media that might contain such files.

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

DATED: August 29, 2011

s/ Paul Ceglia
Paul D. Ceglia