UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK	
PAUL D. CEGLIA,	x :
Plaintiff,	DECLARATION IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE
MARK ELLIOT ZUCKERBERG, Individually, and FACEBOOK, INC ,	Civil Action No. 1:10-cv-00569- RJA
Defendants	: x

TERRENCE P. FLYNN, ESQ., under penalty of perjury and pursuant to 28 U.S C. § 1746, declares that the following is true and correct:

- 1 I am a member of the bar of this Court and a member of the law firm of Harris Beach PLLC, attorneys for Defendants Mark Elliot Zuckerberg and Facebook, Inc. ("Defendants"), and as such, I am familiar with the facts and circumstances of this action.
- 2. This Declaration is made in support of Defendants' motion for admission *pro hac vice* of attorney Thomas H. Dupree, Jr., with the firm of Gibson, Dunn & Crutcher LLP in Washington, D.C., for purposes of representing Defendants in this matter.
- 3 Thomas H. Dupree, Jr. is admitted to practice in the District of Columbia and is admitted (but on inactive status) in Massachusetts. He is not under suspension or disbarment by any court, and is not eligible for admission to the bar of this court under subdivision (a) of Rule 83.1 of the Local Rules of Civil Procedure for the United States District Court for the Western District of New York. Attached hereto as **Exhibit A** is Mr. Dupree's declaration in support of this motion.

4 If admitted pro hac vice before this Court, Mr. Dupree will conduct himself in

accordance with the applicable rules and regulations governing the conduct of attorneys within

the State of New York and this District.

5 The requirements for pro hac vice admission of attorney Thomas H. Dupree, Jr. are

satisfied and I recommend that he be admitted to practice pro hac vice before this Court for

purposes concerning the within action.

WHEREFORE, it is respectfully requested that this Court grant Defendants' motion to

admit attorney Thomas H. Dupree, Jr. to practice pro hac vice before this Court, for purposes in

connection with this litigation.

Dated:

August 30, 2010

/s/ Terrance P. Flynn

Terrance P. Flynn

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Exhibit A

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK	
	x .
PAUL D. CEGLIA,	:
Plaintiff,	DECLARATION IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE
MARK ELLIOT ZUCKERBERG, Individually, and FACEBOOK, INC.,	Civil Action No. 1:10-cv-00569- RJA
Defendants.	: x

Thomas H. Dupree, Jr., under penalty of perjury and pursuant to 28 U.S.C. § 1746, declares that the following is true and correct:

- 1. I am an attorney licensed to practice in the District of Columbia and am a member of the law firm of Gibson, Dunn & Crutcher LLP, 1050 Connecticut Avenue NW, Washington, D.C. 20036.
- 2. This petition is made for admission to practice *pro hac vice* before this Court in this matter on behalf of MARK ELLIOT ZUCKERBERG and FACEBOOK, INC.
- 3. I obtained my Law Degree (J.D.) from the University of Chicago in 1997. I am experienced in civil litigation and have represented clients throughout the country in a wide variety of trial and appellate matters, including contract disputes.
- 4. I have never been held in contempt of court or censured in a disciplinary proceeding, suspended or disbarred by any court or admonished by any disciplinary committee of the organized bar, and I am not the subject of any pending complaint before any court.
- 5. I have read and am familiar with the Judicial Code, 28 U.S.C. §§ 1330-1425, which pertain to jurisdiction and venue in a United States District Court; the Federal Rules of Civil

Procedure; the Federal Rules of Evidence; the Local Rules of Practice for the United States

District Court for the Western District of New York; the New York State Lawyer's Code of

Professional Responsibility; and the Civility Principles of the United States District Court for the

Western District of New York. I agree to adhere faithfully to the New York State Lawyer's

Code of Professional Responsibility.

6 I am currently admitted to practice in the District of Columbia and am admitted (but on inactive status) in Massachusetts

WHEREFORE, it is respectfully requested that this Court grant Defendants' motion to admit attorney Ihomas H. Dupree, Jr. to practice *pro hac vice* before this Court, for purposes in connection with this litigation.

Dated:

August 27, 1010

Thomas H. Dupree, Ir.