

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

PAUL D. CEGLIA,

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

Plaintiff,

v.

DECLARATION
OF PAUL CEGLIA REGARDING
RECENTLY DISCOVERED
EMAIL ACCOUNTS

MARK ELLIOT ZUCKERBERG, Individually, and
FACEBOOK, INC.

Defendants.

DECLARANT, submits this declaration and hereby declares under penalty of perjury and pursuant to 28 U.S.C. 1746 and under the laws of the United States that the following is true and correct:

1. I make this declaration upon personal knowledge.
2. I was recently made aware of additional email accounts accessed from a computer analyzed by Defendants' electronic discovery firm.
3. At the time of completing any prior declarations, I did not recall the existence of any of these email accounts, otherwise, they would have been disclosed in those declarations per the court's orders. These email accounts were not concealed from anyone by their omission from prior declarations.
4. At the time of the filing of any prior declarations regarding email accounts, I did not recall creating or using the following email accounts:
 - a. landlubber39@yahoo.vom


- b. paulc@hush.com
 - c. alleganypellets@gmail.com
 - d. getzuck@gmail.com
 - e. paul@streetfax.com
 - f. PDCeglia@streetfax.com
5. Immediately upon being informed of the existence of the accounts listed in a-d above, and being provided consent forms for accessing same, I completed those consent forms, signed them and returned them to my lawyer, Dean Boland.
 6. The email addresses in e and f above, were created by Defendant Zuckerberg.
 7. Upon recalling those email accounts in e and f above, I immediately disclosed that fact to my counsel who disclosed that fact to Defendants' counsel. I have no belief that any data related to those two accounts still exists.
 8. The email addresses in e and f above, were hosted by a server used for operating the streetfax business.
 9. To the best of my recollection, the vendor providing that server space was called ServPath.
 10. The streetfax business was shut down sometime in 2006.
 11. The hosting of those email accounts on those servers would have been terminated in conjunction with the close of the business.
 12. My counsel has communicated to Defendants' counsel the historical existence of these additional email accounts that Defendant Zuckerberg created.
 13. He has also offered that I will sign any consent forms Defendants' deem

necessary to attempt to recover any data from these email accounts.

14. He has also offered that Plaintiff will consent to the issuance of a subpoena to whatever entity Defendants' believe may retain the data related to the accounts in e and f.
15. It is my understanding the signed consent forms for accounts in a-d were provided to Defendants' counsel immediately after receipt by my lawyer.
16. I do not have any recollection at this time of any additional email accounts I may have created and or used other than those already disclosed to Defendants.

I hereby and hereby declare under penalty of perjury and pursuant to 28 U.S.C. 1746 and under the laws of the United States that the following is true and correct:

DATED: February 22, 2012.



Declarant - Paul Ceglia