

UNITED STATES DISTRICT COURT
 WESTERN DISTRICT OF NEW YORK

PAUL D. CEGLIA,	:	
	:	
Plaintiff,	:	Civil Action No. 1:10-cv-00569-
	:	RJA
v.	:	
	:	SUPPLEMENTAL
MARK ELLIOT ZUCKERBERG and	:	DECLARATION OF
FACEBOOK, INC.,	:	ALEXANDER H. SOUTHWELL
	:	
Defendants.	:	
	:	
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I, ALEXANDER H. SOUTHWELL, hereby declare under penalty of perjury that the following is true and correct:

1. I am an attorney licensed to practice law in the State of New York and admitted to practice before this Court. I am a partner in the law firm of Gibson, Dunn & Crutcher LLP, and counsel of record for Defendants Mark Elliot Zuckerberg and Facebook, Inc. in the above-captioned matter. I make this supplemental declaration, based on personal knowledge, in further support of the Defendants’ Eighth Motion to Compel and For Other Relief.

2. Attached hereto as Exhibit A is a true and correct copy of a September 5, 2012 posting on a website that offers a platform for finding online employment entitled “Financial writing on the effect of a lawsuit on a stock price” posted under the username “laotsuit,” in “Wellsville, New York,” which requests a “seasoned writer to write about a well known case and the effect a coming decision is going to have on the stock price.” This posting is available as of September 20, 2012 at <https://www.elance.com/j/financial-writing-on-effect-of-lawsuit-on-stock-price/33295652/>. The person using the username “laotsuit” has, in the past, posted another offer on the same website, noting that s/he is working with “a team of lawyers,” and is seeking “a

detailed examination of the 7th amendment as it relates to a judges ability to dismiss a case prior to trial, with a focus on a judges inability to weigh facts.” A true and correct copy of that post, from April 24, 2012, is attached hereto as Exhibit B.

3. The username “laotsuit” used in both of these posts has also been used in registering the company Allegany Pellets LLC, located in Wellsville, New York, whose contact person is listed as “Mr. Paul Ceglia” on a website called “Made-in-China.com: Connecting Buyers with China Suppliers” (available at <http://www.made-in-china.com/traderoom/laotsuit>).

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 20th day of September 2012 at New York, New York.



Alexander H. Southwell