UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK

PAUL D. CEGLIA,

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

Plaintiff,

DECLARATION
OF LARRY STEWART
REGARDING DEFENDANTS
MOTION FOR DISCOVERY

v.

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 have previously provided, on multiple occasions, all documents in my possession, custody or control responsive to Defendants' discovery requests.
- 3. I have no additional documents to provide to the Defendants.
- 4. Although Defendants have never provided me my deposition for error review, I stand by my statements regarding ink samples.
- 5. I worked with Mr. Speckin taking samples and we shared information to avoid duplication of work.
- 6. My testimony at deposition, in context, was clearly referring to the Plaintiff's expert's team effort, Mr. Speckin and I, taking samples per the Court's order.

- 7. My recollection is that I sent samples from the two page FB Contract to Mr. Rantanen for testing.
- 8. I acknowledge that there is a conflict in the notations on my paperwork. However, my paperwork sent to Mr. Rantanen specifically asked for his opinions regarding the yellowing present on the front side of each of the two samples of the two pages of the FB Contract. Therefore, it was clearly my belief that I was submitting to Mr. Rantanen the paper samples from the Facebook Contract to evaluate as the other document in this matter was not overexposed by Defendants' experts. The overexposure by Defendants' experts to ultraviolet light resulted in the yellowing they caused only in the Facebook Contract.
- 9. Contrary to Defendants' assertions, I did not lie to this Court.

I 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: October 8, 2012.

Larry Stewart