

# Exhibit “E”

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

----- X  
PAUL D. CEGLIA, :  
 :  
 Plaintiff, :  
 :  
 v. : Civil Action No. 1:10-cv-00569-  
 : RJA  
 MARK ELLIOT ZUCKERBERG and :  
 FACEBOOK, INC., :  
 :  
 Defendants. :  
----- X

**DECLARATION OF NATHAN SHAMAN PURSUANT TO LOCAL RULE 7(d)(4)**

Nathan Shaman, being over the age of 21, submits this Declaration pursuant to Local Rule 7(d)(4), in support of Plaintiff’s Motion to Compel Defendant Zuckerberg’s Compliance with the Court’s Order of July 1, 2011 (Motion to Compel) and hereby declares under penalty of perjury:

1. I am an associate with Jeffrey A. Lake, A.P.C., counsel of record for Plaintiff Paul Ceglia in the above-captioned matter.
2. In a July 21, 2011 email, I asked Defendant’s counsel Alexander Southwell whether Defendant had produced the emails in accordance with the Court’s July 1, 2011 Order.
3. Mr. Southwell did not respond to my direct request but instead referred my attention to the letter he sent Jeffrey A. Lake on July 20, 2011. A true and correct copy of that letter is attached as Exhibit C to the Motion to Compel.

4. The July 20, 2011 Letter from Mr. Southwell contained Defendant's refusal to comply with the Court's July 1, 2011 Order.

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

**DATED: July 25, 2011**

s/ Nathan Shaman