

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOHN HENRY BROWNE and ALAN J.
WENOKUR, individually and on behalf of
others similarly situated,

Plaintiffs,

v.

AVVO, INC., MARK BRITTON, and JOHN
DOES 1-25,

Defendants.

No. CV7 920 RSL

DECLARATION OF KAREN
SHAAK IN SUPPORT OF
DEFENDANTS' MOTION TO
DISMISS CLASS ACTION
COMPLAINT

**Note on Motion Calendar:
July 20, 2007**

Karen Shaak declares as follows:

1. **Identity of Declarant.** I am Program Manager for Avvo, Inc., in Seattle, Washington. I have held this position since September 11, 2006. In this position, I am responsible for various aspects of software development, testing, and design, including coordination of the development process with members of Avvo's business and development teams. As part of my job responsibilities, I have access to the servers upon which Avvo stores its databases, including the systems and tools to access data. I make this declaration based upon my personal knowledge acquired in this position.

2. **Avvo Beta Website.** Avvo recently launched a beta version of its website, www.avvo.com, on June 5, 2007, meaning that the site was not meant to be a final version,

1 but rather one ready for testing by the wider public for feedback on bugs and features. As
2 such, the Avvo beta site is subject to constant editing and changes on a daily basis.

3 3. ***Complaints About Beta Version.*** I have read Plaintiff's Complaint, which
4 refers to a variety of pages on Avvo's website prior to changes made to the site on June 26,
5 2007. Archived screenshots of pages from Avvo's previous site, however, presently reside on
6 Avvo's servers and are attached as Exhibit A. If a reader had visited Avvo's website on June
7 14, 2007, the day the Complaint was filed, these pages would have been available to them.

8 I declare under penalty of perjury that the foregoing is true and correct.

9 Executed on June 28, 2007, in Seattle, Washington.

10
11 
12 Karen Shaak

CERTIFICATE OF SERVICE

1 I hereby certify that on June 28, 2007, I electronically filed the foregoing with the
2 Clerk of the Court using the CM/ECF system which will send notification of such filing to the
3 following:

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