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 FACEBOOK, INC.

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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

<p>FACEBOOK, INC.,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>POWER VENTURES, INC. a Cayman Island          Corporation,; STEVE VACHANI, an          individual; DOE 1, d/b/a POWER.COM,          DOES 2-25, inclusive,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. 5:08-cv-05780 JW</p> <p><b>DECLARATION OF MORVARID          METANAT IN SUPPORT OF          DEFENDANTS' ADMINISTRATIVE          MOTION FOR SEALING ORDER          PURSUANT TO CIVIL L.R. 79-5(D)          IN CONNECTION WITH          DEFENDANTS' REPLY BRIEF IN          SUPPORT OF MOTION FOR          SUMMARY JUDGMENT</b></p> <p>Courtroom: 9, 19th Floor          Judge: Hon. James Ware</p>
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Case No. 5:08-cv-05780 JW

**DECLARATION OF MORVARID  
 METANAT IN SUPPORT OF  
 DEFENDANTS' ADMINISTRATIVE  
 MOTION FOR SEALING ORDER  
 PURSUANT TO CIVIL L.R. 79-5(D)  
 IN CONNECTION WITH  
 DEFENDANTS' REPLY BRIEF IN  
 SUPPORT OF MOTION FOR  
 SUMMARY JUDGMENT**

Courtroom: 9, 19th Floor  
 Judge: Hon. James Ware

1 I, Morvarid Metanat, declare:

2 1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP and  
3 counsel for Plaintiff Facebook, Inc. I make this declaration in support of Defendants'  
4 Administrative Motion for Sealing Order Pursuant to Civil L.R. 79-5(d), in connection with  
5 Defendants' Reply Brief in Support of Defendants' Motion for Summary Judgment. Facebook  
6 seeks to File under Seal portions of Defendants' Reply that make reference to the Declaration of  
7 Ryan McGeehan in Support of Facebook's Motion for Partial Summary Judgment on Count 1  
8 ("McGeehan Decl.").

9 2. Facebook has designated the McGeehan Declaration as "HIGHLY-  
10 CONFIDENTIAL-ATTORNEYS' EYES ONLY" pursuant to the Parties' Protective Order, dated  
11 February 4, 2011 (Dkt. No. 95). The McGeehan Declaration discusses Facebook's internal  
12 infrastructure in responding to attacks on Facebook's systems and servers, including the security  
13 and privacy-based technical measures implemented by Facebook to prevent such attacks. This  
14 security information is highly sensitive, and Facebook may suffer irreparable harm if this  
15 information is not protected from disclosure through public filing. Specifically, public disclosure  
16 of Facebook's technical and security measures implemented to prevent attacks on Facebook  
17 would be potentially informative to third parties who wish to circumvent such measures, putting  
18 Facebook at significant risk for future, pervasive attacks. Facebook requests that Defendants'  
19 Oppositions to Facebook's Motions for Summary Judgment be redacted to the extent Defendants  
20 quote from or refer to the McGeehan Declaration in their Oppositions to Facebook's motions for  
21 summary judgment.

22 3. On November 28, 2011, the Court granted Facebook's Motion to Seal the  
23 Declaration of Ryan McGeehan in Support of Facebook's Motion for Partial Summary Judgment  
24 on Count 1, and thus, all excerpts from, and references to, the McGeehan Declaration should be  
25 filed under seal. *See* Dkt. No. 182.

26 4. Facebook, therefore, requests that the following portions of Defendants' Reply  
27 Brief be redacted for good cause:

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- Page 7, Lines 23-24, beginning with "For" through "them."

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- Page 7, Lines 26-28, beginning with “[t]he” through “Use.”

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 14th day of December, 2011 at Menlo Park, California.

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/s/ Morvarid Metanat /s/  
MORVARID METANAT