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11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 TWITTER, INC.,

16 Plaintiff,

17 v.

18 VOIP-PAL.COM, INC.

19 Defendant.
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Case No. 21-cv-09773-JD

**DECLARATION OF GENE W. LEE IN
SUPPORT OF TWITTER INC.'S
MOTION FOR LEAVE TO FILE A
FIRST AMENDED COMPLAINT**

1 I, Gene W. Lee, declare as follows:

2 1. I am a licensed attorney with the law firm Perkins Coie LLP. I am lead counsel of
3 record for plaintiff Twitter, Inc. (“Twitter”), and I am admitted *pro hac vice* in this action. I have
4 personal knowledge of the matters stated in this declaration and would testify truthfully to them if
5 called upon to do so.

6 2. I make this declaration in support of Twitter’s Motion for Leave to File a First
7 Amended Complaint.

8 3. Attached as Exhibit A is a true and correct copy of Twitter’s proposed First
9 Amended Complaint.

10 4. Attached as Exhibit B is a true and correct copy of a redline showing changes made
11 in Twitter’s First Amended Complaint from the originally filed Complaint.

12 5. Attached as Exhibit C is a true and correct copy of the filing at Docket Number 82
13 in the case *VoIP-Pal.com, Inc. v. Twitter, Inc.*, Case No. 18-cv-04523-LHK.

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

15 Dated: September 9, 2022

By: /s/ Gene Lee
Gene W. Lee

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