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25 **UNITED STATES DISTRICT COURT**
26 **DISTRICT OF NEVADA**

27 LIBERTY MEDIA HOLDINGS, LLC, a
28 California Corporation,

Plaintiff,

vs.

FF MAGNAT LIMITED, d/b/a Oron.com;
MAXIM BOCHENKO, a/k/a Roman
Romanov; and John Does 1-500,

Defendants.

Case No.: 2:12-cv-01057-GMN-RJJ

**DECLARATION OF STEVAN
LIEBERMAN IN SUPPORT OF ORON'S
MOTION FOR DISBURSEMENT OF
ADDITIONAL FUNDS**

Judge: Hon. Gloria N. Navarro

1 I, Stevan Lieberman, declare and state as follows:

2 1. I am a member of the Bars of the State of Maryland and District of Columbia, and counsel
3 to Defendant FF Magnat Limited. I make this declaration in support of Defendant's Motion for
4 Disbursement of Additional Funds. If called as a witness, I could and would so competently testify.

5 2. Attached as Exhibit A is a true and correct copy of a July 26, 2012 Legal Notice received
6 by Oron.com from LeaseWeb B.V.

7 3. On or about June 27, 2012, Oron.com had Mandy Wong request HSBC Hong Kong
8 release funds so that Oron.com may pay for its currently due business expenditures. However, HSBC
9 refused to release any money until the hearing in this matter. Mandy Wong is Oron's Hong Kong Counsel.
10 Attached as Exhibit B is a true and correct copy of Ms. Wong's letter explaining her call to HSBC.

11 4. As explained in the supporting memorandum of points and authorities, Oron.com requests
12 the release of funds from PayPay, Inc. in the amounts of EUR 71.736,22 before July 1, 2012 and a further
13 amount of EUR 277.109,07 before July 9, 2012 in order to pay the server invoices from LeaseWeb B.V.

14 5. Late on June 28, 2012, just before 10pm EST I received a call from PayPal council. We
15 discussed the situation and I was informed that it might be hard for them to send a wire quickly, that it could
16 take as much as two (2) weeks. Paypal council called me again on the morning of June 29, 2012 and
17 confirmed the previously indicated timing of a wire.

18 6. It was indicated that the reason for the delay was because our client's account is based in
19 Singapore and that wires out of that branch are very slow, especially when being sent to other countries. I
20 was told that the only alternative for alacrity was for our client to put in a request for the money to be sent to
21 my law firm's PayPal account which could then be withdrawn minus PayPal's processing fee. I do not
22 believe there is any other method of moving the money quickly from Oron's PayPal account to pay the
23 LeaseWeb invoices which are due on or before July 1 and July 9..

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

26 Executed this 29th day of June, 2012 at Washington, D.C.

27



28 STEVAN LIEBERMAN