

1 DAVID S. KAHN (NEVADA BAR NO. 7038)  
2 SHERI M. THOME (NEVADA BAR NO. 8627)  
3 WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP  
4 300 South Fourth Street, 11<sup>th</sup> Floor  
5 Las Vegas, NV 89101  
6 Tel: (702) 727-1400 / Fax: (702) 727-1401  
7 [david.kahn@wilsonelser.com](mailto:david.kahn@wilsonelser.com)  
8 [sheri.thome@wilsonelser.com](mailto:sheri.thome@wilsonelser.com)

9 KENNETH E. KELLER (CALIFORNIA BAR NO. 71450) *pro hac vice in process*  
10 STAN G. ROMAN (CALIFORNIA BAR NO. 87652) *pro hac vice in process*  
11 KRIEG, KELLER, SLOAN, REILLEY & ROMAN LLP  
12 555 Montgomery Street, 17<sup>th</sup> Floor  
13 San Francisco, CA 94111  
14 Tel: (415) 249-8330 / Fax: (415) 249-8333  
15 [kkeller@kksrr.com](mailto:kkeller@kksrr.com)  
16 [sroman@kksrr.com](mailto:sroman@kksrr.com)

17 STEVAN LIEBERMAN (WASHINGTON, DC BAR NO. 448218) *pro hac vice in process*  
18 GREENBERG & LIEBERMAN, LLC  
19 2141 Wisconsin Avenue, NW, Suite C2  
20 Washington, DC 20007  
21 Tel: (202) 625-7000 / Fax: (202) 625-7001  
22 [stevan@aplegal.com](mailto:stevan@aplegal.com)

23 Attorneys for Defendant  
24 FF MAGNAT LIMITED, d/b/a Oron.com

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 contacted Mandy Wong to request HSBC Hong  
8 Kong to release funds so that Oron.com may pay for its currently due business expenditures. However,  
9 HSBC refused to release any money until the hearing in this matter. Attached as Exhibit B is a true and  
10 correct copy of my June 28, 2012 correspondence with Mandy Wong of S.T. Poon & Wong, Solicitors,  
11 13/F & 16/F, Hong Kong Trade Centre, 161-167 Des Voeux Road Central regarding that request.

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

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

17 Executed this 28<sup>th</sup> day of June, 2012 at Washington, D.C.

18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

  
STEVAN LIEBERMAN