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HONORABLE BARBARA LINDE  
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KING COUNTY  
SUPERIOR COURT CLERK  
WITH ORAL ARGUMENT  
E-FILED

CASE NUMBER: 14-2-07669-0 SEA

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR THE COUNTY OF KING

MOVE, INC., a Delaware corporation,  
REALSELECT, INC., a Delaware  
corporation, TOP PRODUCER SYSTEMS  
COMPANY, a British Columbia unlimited  
liability company, NATIONAL  
ASSOCIATION OF REALTORS®, an  
Illinois non-profit corporation, and  
REALTORS® INFORMATION  
NETWORK, INC., an Illinois corporation,

Plaintiffs,

vs.

ZILLOW, INC., a Washington corporation,  
ERROL SAMUELSON, an individual, and  
DOES 1-20,

Defendants.

Case No. 14-2-07669-0 SEA

**DECLARATION OF RACHEL GLASER  
IN SUPPORT OF PLAINTIFFS' MOTION  
FOR PRELIMINARY INJUNCTION**

Rachael Glaser declares as follows:


1. I am over twenty-one years old, I have personal knowledge of the facts in this declaration,  
and I am competent to testify.
2. I am Chief Financial Officer of Move, Inc.

- 1 3. Samuelson continued to be involved in Move's strategic discussions until he resigned.  
2 For instance, Samuelson, Move CEO Steven Berkowitz, and I exchanged emails on  
3 March 3, 2014, about Move's strategy regarding its use of ListHub and how to compete  
4 with Zillow. That same day, Samuelson, Berkowitz, and I, along with two others,  
5 exchanged a different series of emails about a listing syndication opportunity. In those  
6 emails Samuelson said he was going to put together a proposal for this new opportunity.
- 7 4. Given the direct competition between Zillow and Move, the significance of Zillow and  
8 Move to each other as competitors, and the depth of Samuelson's knowledge of Move's  
9 confidential business strategies, I do not see how Samuelson could advise Zillow without  
10 using his knowledge of Move's confidential information.
- 11 5. Samuelson may have already significantly changed Zillow's thinking about ListHub.  
12 ListHub is Move's aggregator of real estate listing information. It supplies Zillow with  
13 about 50% of the listing data on Zillow's website.
- 14 6. On Tuesday, March 4, 2014, the day I understand Samuelson was erasing the memory  
15 from his Move-issued electronics in preparation for his transition to Zillow, Zillow's  
16 CEO, Spencer Rascoff, made a very uncharacteristic comment about ListHub.
- 17 7. Rascoff was giving a presentation at an investors meeting hosted by Morgan Stanley. I  
18 was in attendance. Rascoff said words to the effect of: ListHub needs Zillow more than  
19 Zillow needs ListHub.
- 20 8. Rascoff had spoken publicly about ListHub before but had never made any kind of  
21 statement like the one he made on March 4. Since then, Rascoff and Zillow have made  
22 other public statements indicating that Zillow is not dependent on ListHub for data,  
23 which had never been Zillow's public narrative about Zillow before.  
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I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 27 day of March, 2014 at San Jose (city), CA (state).

  
Rachel Glaser

1 **CERTIFICATE OF SERVICE**

2 The undersigned certifies that on March 27, 2014, I electronically filed the foregoing  
3 with Clerk of the Court utilizing the King County Superior Court E Filing system and served a  
4 true and correct copy of the same, in the manner described below, to:

5  
6 VIA LEGAL MESSENGER:

7 Bruce M. Cross  
8 James Sanders  
9 Perkins Coie LLP  
10 1201 Third Ave., Suite 4900  
11 Seattle, WA 98101-3099  
12 Attorneys for Zillow, Inc.

13  
14 Clemens H. Barnes  
15 Graham & Dunn PC  
16 Pier 70, Alaskan Way, Suite 300  
17 Seattle, WA 98121-1128  
18 Attorneys for Errol Samuelson

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

20 DATED at Seattle, Washington on March 27, 2014.

21  
22 /s/ Katy M. Albritton  
23 Katy M. Albritton, Legal Assistant  
24 Cable Langenbach Kinerk & Bauer, LLP  
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