

# **EXHIBIT MM**

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9 Attorneys for Defendants  
 10 Connectu LLC, Cameron Winklevoss,  
 11 Tyler Winklevoss, Howard Winklevoss,  
 12 and Divya Narendra

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
 14 COUNTY OF SANTA CLARA

15 THE FACEBOOK, INC.

16 Plaintiff,

17 v.

18 CONNECTU LLC, CAMERON WINKLEVOSS,  
 19 TYLER WINKLEVOSS, HOWARD  
 20 WINKLEVOSS, DIVYA NARENDRA, AND  
 21 DOES 1-25,

22 Defendants.

CASE NO. 105 CV 047381

**RESPONSE OF DEFENDANT DIVYA  
 NARENDRA TO FORM  
 INTERROGATORIES**

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1 **Response to 16.6**

2 Not applicable as there was no "unauthorized access of the Facebook's data."

3 **Response to 16.7**

4 Not applicable as there was no "unauthorized access of the Facebook's data."

5 **Response to 16.8**

6 Responding party does not understand Plaintiff is claiming property damage.

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8 **Response to 16.9**

9 Not applicable as there was no "unauthorized access of the Facebook's data."

10 **Response to 17.1**

11 Regarding Request No. 1, Responding Party states he does not have a FACEBOOK  
individual member ID.

12 Regarding Request No. 2, Responding Party visited FACEBOOK's website only in his  
13 capacity as a member of ConnectU. See ConnectU's Response to Request No. 2 and its Response to  
Interrogatory No. 17.1 as it concerns Request For Admissions, No. 2.

14 Regarding Request No. 3, Responding Party visited FACEBOOK's website only in his  
15 capacity as a member of ConnectU. See ConnectU's Response to Request No. 3 and its Response to  
Interrogatory No. 17.1 as it concerns Request For Admissions, No. 3.

16 Regarding Request No. 4, Responding Party visited FACEBOOK's website only in his  
17 capacity as a member of ConnectU. See ConnectU's Response to Request No. 4.

18 Regarding Request No. 5, Responding Party visited FACEBOOK's website only in his  
19 capacity as a member of ConnectU. See ConnectU's Response to Request No. 5.

20 Regarding Request No. 6, Responding Party visited FACEBOOK's website only in his  
21 capacity as a member of ConnectU. See ConnectU's Response to Request No. 6 and its Response to  
Interrogatory No. 17.1 as it concerns Request For Admissions, No. 6.

22 Regarding Request No. 7, Responding Party visited FACEBOOK's website only in his  
23 capacity as a member of ConnectU. See ConnectU's Response to Request No. 7.

24 Regarding Request No. 8, Responding Party activities regarding FACEBOOK's website  
25 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.  
8 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 8.

26 Regarding Request No. 9, Responding Party activities regarding FACEBOOK's website  
27 were done only in his capacity as a member of ConnectU.. See ConnectU's Response to Request  
No. 9 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 9.

28 Regarding Request No. 10, Responding Party activities regarding FACEBOOK's website  
were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.  
10 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 10.

1           Regarding Request No. 11, Responding Party activities regarding FACEBOOK's website  
2 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.  
11 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 11.

3           Regarding Request No. 12, Responding Party activities regarding FACEBOOK's website  
4 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.  
12 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 12.

5           Regarding Request No. 13, Responding Party activities regarding FACEBOOK's website  
6 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.  
13 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 13.

7           Regarding Request No. 14, Responding Party activities regarding FACEBOOK's website  
8 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.  
14 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 14.

9           Regarding Request No. 15, Responding Party visited FACEBOOK's website only in his  
10 capacity as a member of ConnectU. See ConnectU's Response to Request No. 15 and its Response  
to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 15.

11           Regarding Request No. 16, Responding Party visited FACEBOOK's website only in his  
12 capacity as a member of ConnectU. See ConnectU's Response to Request No. 16.

13           Regarding Request No. 17, Responding Party visited FACEBOOK's website only in his  
14 capacity as a member of ConnectU. See ConnectU's Response to Request No. 17 and its Response  
to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 17.

15           Regarding Request No. 18, Responding Party visited FACEBOOK's website only in his  
16 capacity as a member of ConnectU. See ConnectU's Response to Request No. 18 and its Response  
to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 18.

17           Regarding Request No. 19, Responding Party visited FACEBOOK's website only in his  
18 capacity as a member of ConnectU. See ConnectU's Response to Request No. 19 and its Response  
to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 19.

19           Regarding Request No. 20, Responding Party visited FACEBOOK's website only in his  
20 capacity as a member of ConnectU. See ConnectU's Response to Request No. 20 and its Response  
to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 20.

21           Regarding Request No. 21, Responding Party visited FACEBOOK's website only in his  
22 capacity as a member of ConnectU. See ConnectU's Response to Request No. 21 and its Response  
to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 21.

23           Regarding Request No. 22, Responding Party activities regarding FACEBOOK's website  
24 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.  
22.

25           Regarding Request No. 23, Responding Party activities regarding FACEBOOK's website  
26 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.  
23 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 23.

27           Regarding Request No. 24, Responding Party activities regarding FACEBOOK's website  
28 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.  
24 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 24.

1           Regarding Request No. 25, Responding Party activities regarding FACEBOOK's website  
2 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.  
25 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 25.

3           **Response to 50.3**

4           Responding party does not understand that there is an agreement alleged in the Plaintiff's  
5 complaint.

6           **Response to 50.4**

7           Responding party does not understand that there is an agreement alleged in the Plaintiff's  
8 complaint.

9           **Response to 50.5**

10          Responding party does not understand that there is an agreement alleged in the Plaintiff's  
11 complaint.

12          **Response to 50.6**

13          Responding party does not understand that there is an agreement alleged in the Plaintiff's  
14 complaint.

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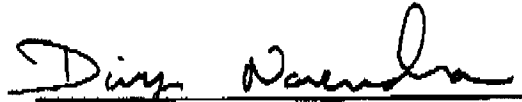
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**VERIFICATION**

DIVYA NARENDRA, under penalty of perjury under the laws of the State of California, states as follows:

- 1. That he is one of the Defendants in the above-entitled action;
- 2. That he has read the foregoing RESPONSE OF DIVYA NARENDRA TO FORM INTERROGATORIES and knows the contents thereof, and that the same is true of his own knowledge, save and except as to the matters which are therein stated on his information or belief, and as to those matters, he believes it to be true.

Executed on the 31 day of October, 2005, at NY,NY

  
 \_\_\_\_\_  
 Divya Narendra