

EXHIBIT SS

1 Scott R. Mosko (State Bar No. 106070)
 2 FINNEGAN, HENDERSON, FARABOW,
 3 GARRETT & DUNNER, L.L.P.
 4 Stanford Research Park
 5 700 Hansen Way
 6 Palo Alto, California 94304
 7 Telephone: (650) 849-6600
 8 Facsimile: (650) 849-6666

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
 CONNECTU LLC TO FIRST SET OF
 REQUESTS FOR ADMISSION**

1 **PROPOUNDING PARTY:** Plaintiff THEFACEBOOK, INC.

2 **RESPONDING PARTY:** Defendant CONNECTU LLC

3 **SET NO.:** ONE (1)

4 TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

5 The above-named party hereby responds, pursuant to California Code of Civil Procedure
6 Section 2033, to the requests for admission as follows:

7 **RESPONSE TO REQUESTS FOR ADMISSIONS**

8 **RESPONSE TO REQUEST NO. 1:**

9 This Request is Denied.

10 **RESPONSE TO REQUEST NO. 2:**

11 ConnectU cannot admit or deny this request as it assumes an unestablished fact that the
12 FACEBOOK listed email addresses on its website that had been "previously registered".

13 **RESPONSE TO REQUEST NO. 3:**

14 ConnectU admits that when it entered FACEBOOK's site, various colleges and universities
15 were identified. ConnectU did not understand what was on FACEBOOK's site before it was visited.
16 ConnectU has no recollection whether "the purpose" of visiting the FACEBOOK's site was to
17 identify colleges and universities, and therefore cannot admit or deny this Request.

18 **RESPONSE TO REQUEST NO. 4:**

19 ConnectU objects to the phrase "visible website features" as vague and ambiguous. As such,
20 ConnectU cannot admit or deny this Request. ConnectU admits visiting FACEBOOK's website,
21 however, ConnectU did not understand what was on FACEBOOK's site before it was visited.

22 **RESPONSE TO REQUEST NO. 5:**

23 ConnectU objects to the phrase "functions permitted" as vague and ambiguous. As such,
24 ConnectU cannot admit or deny this Request. ConnectU admits visiting various pages of
25 FACEBOOK's website, and as a result acquiring a partial understanding of how FACEBOOK's site
26 operated, however, ConnectU did not understand what was on FACEBOOK's site before it was
27 visited. .

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1 **RESPONSE TO REQUEST NO. 6:**

2 This Request is Denied.

3 **RESPONSE TO REQUEST NO. 7:**

4 This Request is Admitted.

5 **RESPONSE TO REQUEST NO. 8:**

6 This Request is Denied

7 **RESPONSE TO REQUEST NO. 9:**

8 This Request is Denied

9 **RESPONSE TO REQUEST NO. 10:**

10 This Request is Denied

11 **RESPONSE TO REQUEST NO. 11:**

12 This Request is Denied

13 **RESPONSE TO REQUEST NO. 12:**

14 This Request is Denied.

15 **RESPONSE TO REQUEST NO. 13:**

16 This Request is Denied.

17 **RESPONSE TO REQUEST NO. 14:**

18 This Request is Denied

19 **RESPONSE TO REQUEST NO. 15:**

20 This Request is Denied

21 **RESPONSE TO REQUEST NO. 16:**

22 ConnectU cannot admit or deny this Request as its members who have visited the site have
23 no independent recollection whether FACEBOOK included a section called "Terms of Use".

24 **RESPONSE TO REQUEST NO. 17:**

25 ConnectU cannot admit or deny this Request as its members who have visited the site have
26 no independent recollection whether FACEBOOK included a section called "Terms of Use".
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1 **RESPONSE TO REQUEST NO. 18:**

2 This Request is Denied. While CONNECTU does not recall whether FACEBOOK included
3 a section called "Terms of Use", it never agreed to any conditions during any visit made to the site.

4 **RESPONSE TO REQUEST NO. 19:**

5 ConnectU cannot admit or deny this Request as its members who have visited the site have
6 no independent recollection whether FACEBOOK included a section called "Terms of Use".

7 **RESPONSE TO REQUEST NO. 20:**

8 ConnectU cannot admit or deny this Request as its members who have visited the site have
9 no independent recollection whether FACEBOOK included a section called "Terms of Use".

10 **RESPONSE TO REQUEST NO. 21:**

11 ConnectU cannot admit or deny this Request as its members who have visited the site have
12 no independent recollection whether FACEBOOK included a section called "Terms of Use".

13 **RESPONSE TO REQUEST NO. 22:**

14 This Request is Denied.

15 **RESPONSE TO REQUEST NO. 23:**

16 This Request is Denied.

17 **RESPONSE TO REQUEST NO. 24:**

18 This Request in Denied.

19 **RESPONSE TO REQUEST NO. 25:**

20 This Request is Denied.

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I, CAMERON WINKLEVOSS on behalf of CONNECTU LLC under penalty of perjury under the laws of the State of California, state as follows:

1. That I am an officer of ConnectU LLC.

2. That ConnectU LLC, is one of the defendants in the above-entitled action; *and to first set of REQUESTS FOR ADMISSIONS*

3. That I have read the foregoing RESPONSE OF DEFENDANT CONNECTU LLC TO FORM INTERROGATORIES, and know the contents thereof; and that I am informed and believe and thereon state that the matters stated therein are true.

Executed on the 30 day of October, 2005, at 7:25 PM.



Cameron Winklevoss, _____