LaRussa v. Twitter Inc.

Doc. 158 Att. 14

EXHIBIT R

Doc. No. 430394

1	Scott R. Mosko (State Bar No. 106070) FINNEGAN, HENDERSON, FARABOW,	
2	GARRETT & DUNNER, L.L.P.	
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4	11 1 () + 12 0000	
5	Facsimile: (650) 849-6666	
6	Attorneys for Defendants	
7	Connectu LLC, Cameron Winklevoss, Tyler Winklevoss, Howard Winklevoss,	
8	and Divya Narendra	
9		
10	SUPERIOR COURT OF THE STATE OF CALIFORNIA	
11	COUNTY OF SANTA CLARA	
12		
13	THE FACEBOOK, INC.	CASE NO. 105 CV 047381
14	Plaintiff,	RESPONSE OF DEFENDANT DIVYA
15	v.	NARENDRA TO FIRST SET OF REQUESTS FOR ADMISSION
16	CONNECTU LLC, CAMERON WINKLEVOSS,	
17	TYLER WINKLEVOSS, HOWARD WINKLEVOSS, DIVYA NARENDRA, AND DOES 1-25,	
18	Defendants.	
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RESPONSE OF DEFENDANT DIVYA NARENDRA TO FIRST SET OF REQUESTS FOR ADMISSION

PROPOUNDING PARTY: Plaintiff THEFACEBOOK, INC.

RESPONDING PARTY: Defendant DIVYA NARENDRA

SET NO.: ONE (1)

TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

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

RESPONSE TO REQUESTS FOR ADMISSIONS

RESPONSE TO REQUEST NO. 1:

This Request is Denied.

RESPONSE TO REQUEST NO. 2:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 2.

RESPONSE TO REQUEST NO. 3:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 3.

RESPONSE TO REQUEST NO. 4:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 4.

RESPONSE TO REQUEST NO. 5:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 5.

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RESPONSE TO REQUEST NO. 6:

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Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 6.

RESPONSE TO REQUEST NO. 7:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 7.

RESPONSE TO REQUEST NO. 8:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 8.

RESPONSE TO REQUEST NO. 9:

This Request is Denied.

RESPONSE TO REQUEST NO. 10:

This Request is Denied.

RESPONSE TO REQUEST NO. 11:

This Request is Denied.

RESPONSE TO REQUEST NO. 12:

This Request is Denied.

RESPONSE TO REQUEST NO. 13:

This Request is Denied.

RESPONSE TO REQUEST NO. 14:

This Request is Denied.

RESPONSE TO REQUEST NO. 15:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 15.

RESPONSE TO REQUEST NO. 16:

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Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 16.

RESPONSE TO REQUEST NO. 17:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 17.

RESPONSE TO REQUEST NO. 18:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 18.

RESPONSE TO REQUEST NO. 19:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 19.

RESPONSE TO REQUEST NO. 20:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 20.

RESPONSE TO REQUEST NO. 21:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 21.

RESPONSE TO REQUEST NO. 22:

This Request is Denied.

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1 RESPONSE TO REQUEST NO. 23:

This Request is Denied.

RESPONSE TO REQUEST NO. 24:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 24.

RESPONSE TO REQUEST NO. 25:

This Request is Denied.

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Dœ. No. 430394 NO. 7992

<u>VERIFICATION</u>

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

- That he is one of the Defendants in the above-entitled action; 1.
- 2. That he has read the foregoing RESPONSE OF DEFENDANT DIVYA NARENDRA TO FIRST SET OF REQUESTS FOR ADMISSIONS 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

RESPONSE OF DEFENDANT DIVYA NARENDRA TO FIRST SET OF REQUESTS FOR ADMISSION FIRSTBOSTON