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FACEBOOK, INC. and MARK ZUCKERBERG

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

15 FACEBOOK, INC. and MARK
ZUCKERBERG,

16 Plaintiffs,

17 v.

18 CONNECTU, INC. (formerly known as
19 CONNECTU, LLC), CAMERON
WINKLEVOSS, TYLER WINKLEVOSS,
20 DIVYA NARENDRA, PACIFIC
NORTHWEST SOFTWARE, INC.,
21 WINSTON WILLIAMS, WAYNE CHANG,
and DAVID GUCWA,

22 Defendants.
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Case No. 5:07-CV-01389-RS

**DECLARATION OF MONTE M. F.
COOPER IN SUPPORT OF REPLY
MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF
FACEBOOK'S MOTION TO
COMPEL PACIFIC NORTHWEST
SOFTWARE AND WINSTON
WILLIAMS TO PROVIDE
COMPLETE AND SUPPLEMENTAL
RESPONSES TO FACEBOOK'S
FIRST SET OF INTERROGATORIES
NOS. 3 AND 4**

Date: November 28, 2007
Time: 9:30 A.M.
Judge: Hon. Richard Seeborg

1 I, Monte M. F. Cooper, declare as follows:

2 1. I am Of Counsel at the law firm of Orrick, Herrington & Sutcliffe, counsel for
3 Plaintiffs Facebook, Inc. and Mark Zuckerberg in this action, and a member of the Bar of the
4 states of California and Colorado. I make this declaration in support of Reply Memorandum of
5 Points and Authorities in Support of Facebook's Motion to Compel Pacific Northwest Software
6 and Winston Williams to Provide Complete and Supplemental Responses to Facebook's First Set
7 of Interrogatories Nos. 3 and 4. I make this declaration of my own personal knowledge and, if
8 called as a witness, I could and would testify competently to the truth of the matters set forth
9 herein.

10 2. Attached hereto as **Exhibit I** is a true and correct copy of relevant excerpts from
11 the Deposition of Winston Williams, taken June 19, 20007. **[CONFIDENTIAL DOCUMENT**
12 **SUBMITTED SEPARATELY UNDER SEAL]**

13 3. Attached hereto as **Exhibit J** is a true and correct copy of documents produced by
14 Defendant David Gucwa, bates labeled GUCWA 0004, 68, 75-78, 90, 97-102, 112-113, 117-119,
15 128, 134, 136, 142-143 and 147.

16 4. Attached hereto as **Exhibit K** is a true and correct copy of a document produced
17 by Defendant Pacific Northwest Software, Inc. ("PNS"), bates label PNS0002119.
18 **[CONFIDENTIAL DOCUMENT SUBMITTED SEPARATELY UNDER SEAL]**

19 5. Attached hereto as **Exhibit L** is a true and correct copy of a Faxed letter from
20 Scott R. Mosko to Theresa A. Sutton attaching the Declaration of Winston Williams, dated
21 November 5, 2007 and sent at 7:03 p.m. PST.

22 I declare under penalty of perjury that the forgoing is true and correct to the bet of my
23 knowledge.

24 Executed this 14th of November, 2007, at Menlo Park, California.

25
26 /s/ Monte M. F. Cooper /s/
27 Monte M. F. Cooper
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that this document(s) filed through the ECF system will be sent
3 electronically to the registered participants as identified on the Notice of Electronic Filing (NEF)
4 and paper copies will be sent to those indicated as non registered participants on November 14
2007.

5 Dated: November 14, 2007

Respectfully submitted,

6 /s/ Monte M. F. Cooper /s/
7 Monte M. F. Cooper
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