

EXHIBIT W

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Scott R. Mosko (State Bar No. 106070)
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.
Stanford Research Park
3300 Hillview Avenue
Palo Alto, California 94304
Telephone: (650) 849-6600
Facsimile: (650) 849-6666

Attorneys for Defendants
Connectu LLC, Cameron Winklevoss,
Tyler Winklevoss, Howard Winklevoss,
and Divya Narendra

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SANTA CLARA

THE FACEBOOK, INC.

Plaintiff,

v.

CONNECTU LLC, CAMERON WINKLEVOSS,
TYLER WINKLEVOSS, HOWARD
WINKLEVOSS, DIVYA NARENDRA, AND
DOES 1-25,

Defendants.

CASE NO. 105 CV 047381

**AMENDMENT TO SECOND
AMENDED RESPONSE OF
DEFENDANT CONNECTU LLC TO
PLAINTIFF'S FIRST SET OF
SPECIAL INTERROGATORIES (1-23)**

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

2 **RESPONDING PARTY:** Defendant CONNECTU

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

4

5 TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

6 The above-named party hereby responds, pursuant to California Code of Civil Procedure

7 Section 2030.210(a), to the first set of interrogatories as follows:

8 **RESPONSES AND SPECIFIC OBJECTIONS**

9 14. Because it cited to the Limited Liability Company Operating Agreement--bates
10 number C011285 - 011335, ConnectU interpreted this Interrogatory as calling for the identification
11 of its members from the time the Agreement was executed to the present. ConnectU continues to
12 believe this Interrogatory is vague and ambiguous, compound and complex. If Plaintiff was seeking
13 information regarding ConnectU's membership prior to the date this Agreement was executed,
14 ConnectU does not understand why Plaintiff cited this Agreement in the Interrogatory because this
15 Agreement was executed after ConnectU, LLC was created. ConnectU was created on or about
16 April 6, 2004. If this Interrogatory seeks information regarding ConnectU's membership from the
17 time it was created, ConnectU submits the following amendment to its second amended response to
18 this Interrogatory. From April 6, 2004 to August 5, 2005, the Members of ConnectU were Cameron
19 Winklevoss and Tyler Winklevoss. As of August 5, 2005 and through May 23, 2006, the Members
20 of ConnectU were Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, and Howard
21 Winklevoss. See C011334-C011335. Along with the asserted objections, ConnectU incorporates
22 the balance of its second amended response to this Interrogatory, to the extent this second amended
23 response is consistent with the above.

24 ///

25 ///

26 ///

27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28


VERIFICATION

I, Cameron Winklevoss, declare under penalty of perjury under the laws of the state of California as follows.

I was Co-founder of ConnectU, LLC. ConnectU LLC has now merged into ConnectU, Inc. As a former member of ConnectU LLC and as an officer of ConnectU, Inc., I make this verification for and on its behalf.

I have read the foregoing Amendment to the Second Amended Response of Defendant ConnectU LLC to First Set of Special Interrogatories. The matters herein are true to the best of my knowledge except as to matters stated herein on information and belief, and as to those matters, I believe them to be true.

Executed at Princeton, New Jersey, this 21st day of June, 2006.



Cameron Winklevoss

1 Scott R. Mosko (State Bar No. 106070)
 2 FINNEGAN, HENDERSON, FARABOW,
 3 GARRETT & DUNNER, L.L.P.
 4 Stanford Research Park
 5 3300 Hillview Avenue
 6 Palo Alto, California 94304
 7 Telephone: (650) 849-6600
 8 Facsimile: (650) 849-6666

9 Attorneys for Defendant
 10 ConnectU LLC,

11
 12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 13 COUNTY OF SANTA CLARA

14 THEFACEBOOK, INC.

15 Plaintiff,

16 v.

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

21 Defendants.

22 CASE NO. 105 CV 047381

23 **CERTIFICATE OF SERVICE**

CERTIFICATE OF SERVICE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I am a citizen of the United States, over the age of 18 years, and not a party to this action. My place of employment and business address is Finnegan, Henderson, Farabow, Garrett, & Dunner, L.L.P., 3300 Hillview Avenue, Palo Alto, California 94304. On June 21, 2006, 2006, I caused a copy of the following documents to be served:

- **AMENDMENT TO SECOND AMENDED RESPONSE OF DEFENDANT CONNECTU LLC TO PLAINTIFF'S FIRST SET OF SPECIAL INTERROGATORIES (1-23)**


to be served on all parties as follows:

Attorneys for Plaintiff
Monte Cooper, Esq.
ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
Menlo Park, CA 94025
Telephone: 650.614.7400
Facsimile: 650.614.7401

- Via First Class Mail
- Via Hand Delivery
- Via Overnight Courier
- Via Facsimile
- Via Email

I am readily familiar with my firm's practice for collection and processing of documents by facsimile transmission and email. A true and correct copy of the above document was faxed to the listed facsimile number at our business offices and emailed on June 21, 2006 following ordinary business practice.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, that I am employed in the office of a member of the bar of this court at whose direction the service was made, and that this declaration was executed on June 21, 2006, at Palo Alto, California.


Rosanna Herrick