

01:19:31	1	Q.	Extracted the information?
01:19:32	2	A.	ConnectU followed an open URL, "open" being
01:19:36	3		that it was accessible with not having to
01:19:41	4		use unauthorized access, it was accessible,
01:19:44	5		out in the open, and ConnectU followed those
01:19:46	6		URLs and was able to collect e-mail
01:19:50	7		addresses.
01:19:50	8	Q.	And who did that?
01:19:51	9	A.	Winston Williams.
01:19:52	10	Q.	Winston Williams did that? And when did he
01:19:55	11		do that?
01:19:56	12	A.	I believe he did it in the spring of this
01:19:58	13		year.
01:19:58	14	Q.	Were those e-mails ever used by ConnectU?
01:20:01	15	A.	I think we used some of them with the Social
01:20:06	16		Butterfly software.
01:20:06	17	Q.	And how were they used?
01:20:07	18	A.	If a friend used Social Butterfly and wanted
01:20:11	19		to invite their friends, then they could do
01:20:14	20		that with Social Butterfly. And they --
01:20:16	21	Q.	So when you -- once you had those e-mails,
01:20:20	22		did you -- well, what did you do with them?
01:20:22	23	A.	We just held them in a holding bin, and if a
01:20:29	24		user said, I would like to invite my friend,
01:20:31	25		well, we would just invite their friends.

01:20:34	1	And as I said, we only used a portion of
01:20:36	2	them, because only a portion of the users
01:20:39	3	invited their friends.
01:20:40	4	Q. Did you ever send e-mails to people based
01:20:42	5	upon those e-mails, that e-mail database?
01:20:47	6	A. That's what I just said, that if a user --
01:20:51	7	Q. Let me rephrase that.
01:20:52	8	A. Okay.
01:20:53	9	Q. Independent of a user request, did you ever
01:20:55	10	send an e-mail to people in that --
01:20:59	11	A. With that bucket from the sort of open URL,
01:21:04	12	no, we did not send unsolicited e-mails to
01:21:06	13	those people.
01:21:06	14	Q. Has ConnectU obtained any revenue to date?
01:21:10	15	A. We have obtained some advertising revenue,
01:21:13	16	yeah.
01:21:13	17	Q. And how much revenue is that?
01:21:17	18	MR. HORNICK: I'll object that this
01:21:18	19	is outside the scope as well, but you can
01:21:20	20	answer it. It's not 30(b)(6) testimony.
01:21:22	21	A. I would say roughly no more than \$1,000 of
01:21:30	22	revenue.
01:21:30	23	Q. Okay.
01:21:30	24	A. We haven't actively sought too much
01:21:33	25	advertising at this moment.

01:21:34	1	Q.	How many users does it have?
1:21:36	2	A.	I believe we have 66,000 plus, thereabouts.
01:21:40	3	Q.	And does it -- does it have any university
01:21:50	4		environments for California universities?
01:21:54	5	A.	Yeah, I believe we have California
01:21:57	6		universities, I believe so.
01:22:01	7	Q.	Can you give me some examples?
01:22:04	8	A.	UC Berkeley, I think that.
01:22:07	9		MR. CHATTERJEE: Let's mark this as
01:22:08	10		Exhibit 5. I think we're on Exhibit 5.
01:22:10	11		(Exhibit No. 5, Certificate of
01:22:10	12		Registration, Bates Nos. C004842 - 4845,
01:22:40	13		marked for identification.)
1:22:40	14	Q.	Mr. Winklevoss, what's been handed to you as
01:22:42	15		Exhibit No. 5, do you know what this is?
01:22:48	16	A.	Looks like a copyright signover from Joseph
01:22:57	17		Jackson to ConnectU and one from, I believe,
01:23:05	18		yeah, looks like a copyright signover from
01:23:08	19		Victor Gao, Sanjay, yeah.
01:23:11	20	Q.	What do you --
01:23:12	21		MR. HORNICK: I'll object that this
01:23:14	22		is outside the scope. This is not 30(b)(6)
01:23:17	23		testimony.
01:23:18	24	Q.	What do you mean, "signover"?
01:23:20	25	A.	Well, I would think that they wrote the code

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9 I, CAMERON H. WINKLEVOSS, do hereby declare under
10 penalty of perjury that I have read the foregoing
11 transcript; that I have made any corrections as appear
12 noted, in ink, initialed by me, or attached hereto; that
13 my testimony as contained herein, as corrected, is true
14 and correct.

15 EXECUTED this 12 day of September,
16 20 05, at Queque, NY.
17 (City) (State)
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21 CAMERON H. WINKLEVOSS
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1 In the United States District Court
2 For the District of Massachusetts

3 I, Jessica L. Williamson, Registered,
4 Merit Reporter, Certified Realtime Reporter
5 and Notary Public in and for the
6 Commonwealth of Massachusetts, do hereby
7 certify that CAMERON H. WINKLEVOSS, the
8 witness whose deposition is hereinbefore set
9 forth, was duly sworn by me and that such
10 deposition is a true record of the testimony*
11 given by the witness.

12 I further certify that I am neither
13 related to or employed by any of the parties
14 in or counsel to this action, nor am I
15 financially interested in the outcome of
16 this action.

17 In witness whereof, I have hereunto set
18 my hand and seal this 11th day of August,
19 2005.

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23 _____
24 Jessica L. Williamson, RMR, RPR, CRR
25 Notary Public, CSR No. 138795

My commission expires: 12/18/2009