

EXHIBIT C

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

6 Attorneys for Defendant
Winston Williams
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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11

12 FACEBOOK, INC. and MARK
ZUCKERBERG,

13 Plaintiffs,
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v.
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16 CONNECTU LLC, (now known as CONNECTU
INC.) ET AL.,

Defendants.
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CASE NO. C 07-01389 RS

**DECLARATION OF WINSTON
WILLIAMS IN RESPONSE TO
COURT ORDER DATED DECEMBER
12, 2007**

1 I, WINSTON WILLIAMS, declare

2 1. I have been informed that the Court has issued an Order requiring me to provide
3 further responses in Interrogatory Nos. 3 and 4. As I stated in my prior declaration, prior to the
4 issuance of this recent Court Order, I had reviewed documents and files for the purposes of
5 responding to these interrogatories. I have been informed that Plaintiffs identified additional
6 documents, files, IP addresses and websites which they believe suggest that this new evidence will
7 enable me to provide further answers to these interrogatories. My recent review includes both the
8 new evidence that Plaintiffs have cited in support of their motion to compel, other files and
9 documents available from Pacific Northwest Software, Inc. ("PNS"), and documents provided by
10 David Gucwa. In the following paragraphs of this declaration I will explain the efforts I undertook
11 to comply with this Court's recent order.

12 2. I have reviewed all of the URL's and IP addresses referenced in the briefs filed in
13 support of Plaintiff's Motion to Compel.

14 3. I have reviewed the URL's <http://dp.pickatime.com:900/svn/Connect>,
15 db.pickatime.com, <http://dg.cu.pnwsoft.com/import>,
16 <http://db.pickatime.com:900/svn/Connect/connect>, hop.pickatime.com, web.connectu.com,
17 <http://dev.connectu.com/importer>, <http://cupnwsoft.com/importer>, unix15.dmbhosting.com,
18 www.i2hub.com/dgucwa/face, www.connectu.com/importer.

19 4. I have reviewed the IP addresses 216.127.32.54:900, 216.127.32.54, 216.127.32.54,
20 216.127.32.228, 216.127.32.228, 192.168.0.135, 207.114.225.164, 66.96.217.229, 67.131.250.102,
21 67.18.33.226, 69.56.226.102.

22 5. I am informed that in response to a subpoena, PNS produced documents related to its
23 work for ConnectU, LLC. I have reviewed many of these documents, including correspondence that
24 included me.

25 6. I am also informed that David Gucwa produced documents in responses to a
26 subpoena issued by Plaintiffs. I have reviewed many of these documents, including correspondence

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1 that involved me. None of these documents would enable me to supplement my responses to
2 Interrogatory Nos. 3 & 4.

3 7. I have a working knowledge of the contents of the PNS servers that were utilized
4 during the course of the activities PNS was retained to provide for ConnectU. I was primarily
5 responsible for the work PNS performed for ConnectU. I understand that I have been allowed to
6 access to the PNS servers, and any other data currently available at PNS for the purposes of
7 responding to Interrogatory Nos. 3 & 4. I do not believe such access would allow me to further
8 respond to these interrogatories.

9 8. I am confident that I have reviewed all available information that exists that would
10 provide me or anyone else with the ability to further respond to Interrogatory Nos. 3 & 4.

11 9. None of the documents, files, IP addresses, URLs described above, or other
12 information about which I am aware will permit me to provide further responses to Interrogatory
13 Nos. 3 or 4. The documents cited by Plaintiffs only suggest that certain IP addresses or URLs were
14 used in the course of the ConnectU activities. Despite the contents of these documents, I cannot say
15 under oath that the information found in these documents provides me with the ability to further
16 respond to these interrogatories. In my initial responses to these interrogatories, I was able to
17 identify the few IP addresses that I knew were used to download data from www.thefacebook.com.
18 Weblogs for example would confirm which sources were used in connection with the ConnectU
19 activities, including email communications. Weblog activity however was not maintained on the
20 servers.

21 I declare under penalty of perjury under the laws of the United States that the foregoing is
22 true and correct and that this declaration was executed on the 2nd day of January 2008 at Ft. Myers,
23 Florida.

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26 Winston Williams