

EXHIBIT D

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

FACEBOOK, INC., and MARK
ZUCKERBERG,

Plaintiff,

vs.

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

CONNECTU, INC., (formerly known
as CONNECTU, LLC), CAMERON
WINKLEVOSS, TYLER WINKLEVOSS,
DIVYA NARENDRA, PACIFIC NORTHWEST
SOFTWARE, INC., WINSTON WILLIAMS,
WAYNE CHANG, and DAVID GUCWA
and DOES 1-25,

Defendants.

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***** HIGHLY CONFIDENTIAL *****

VIDEOTAPED DEPOSITION OF WINSTON WILLIAMS

Tuesday, June 19, 2007

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SHEILA CHASE & ASSOCIATES
REPORTING FOR:
LiveNote World Service
221 Main Street, Suite 1250
San Francisco, California 94105
Phone: (415) 321-2300
Fax: (415) 321-2301

Reported by:
RACHEL FERRIER, CSR
CSR No. 6948

1 Q All right. Those are the only three IP
2 addresses you have ever accessed thefacebook.com
3 Website from?

4 A No.

5 Q All right. What other IP addresses have
6 you accessed it from?

7 A Various. Many, many IP addresses that I
8 don't have any log or recollection of.

9 Q Okay. And were any of those addresses
10 addresses associated with friends' computers?

11 A Probably.

12 Q All right. Would that be Joel Voss?

13 A I believe I have access to the site using
14 his machine, yes.

15 Q All right. Any other friends you can think
16 of that you used?

17 A My brother.

18 Q Okay. And that's Colin Williams?

19 A Yes.

20 Q And does he reside in Washington now?

21 A Yes.

22 Q All right. Anybody else?

23 A I can't recall.

24 Q All right. Did you ever use any computer
25 that was provided to you by Cameron Winklevoss to