

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 Defendants  
 Pacific Northwest Software, Inc.,  
 7 Winston Williams, and Wayne  
 Chang  
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10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA  
 12 SAN JOSE DIVISION

13 FACEBOOK, INC., and MARK ZUCKERBERG,

14 Plaintiffs,

15 v.

16 CONNECTU LLC, (now known as CONNECTU  
 17 INC.), ET AL.,

18 Defendants.  
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CASE NO. C 07-01389 RS

**DEFENDANTS' ADMINISTRATIVE  
 MOTION TO FILE UNDER SEAL  
 THE HIGHLIGHTED AND  
 UNREDACTED VERSION OF  
 DEFENDANTS CONNECTU LLC,  
 PACIFIC NORTHWEST SOFTWARE,  
 INC., WINSTON WILLIAMS AND  
 WAYNE CHANG'S OPPOSITION TO  
 PLAINTIFFS' MOTION FOR  
 PARTIAL SUMMARY JUDGMENT;  
 DECLARATION OF WINSTON  
 WILLIAMS IN SUPPORT THEREOF;  
 DECLARATION OF G. HUNTER  
 JONES, INCLUDING EXHIBIT B;  
 AND EXHIBITS A AND C TO THE  
 DECLARATION OF SCOTT R.  
 MOSKO IN SUPPORT THEREOF**

**DECLARATION OF SCOTT R.  
 MOSKO**

**[PROPOSED] ORDER**

Date: February 27, 2008 10, 2007  
 Time: 9:30 a.m.  
 Courtroom.: 4  
 Judge: Honorable Richard Seeborg



1 Stipulated Protective Order in the Santa Clara County Superior Court action, Case No. 1:05-CV-  
2 047381, and hence is subject to Local Civil Rule 79-5(c) and the excerpts should be sealed from public  
3 view.

4 c. Exhibit B to the Jones Declaration is a true and correct copy of a file produced  
5 on CD Bates number FBMA0059471 by Plaintiffs and designated as Confidential pursuant to the  
6 Stipulated Protective Order in the Santa Clara County Superior Court action, Case No. 1:05-CV-  
7 047381, and hence is subject to Local Civil Rule 79-5(b) and the document should be sealed from  
8 public view.

9 d. Exhibit A to the Declaration of Scott R. Mosko in Support of Defendants  
10 ConnectU LLC, Pacific Northwest Software, Inc., Winston Williams and Wayne Chang's Opposition  
11 to Plaintiffs' Motion for Partial Summary Judgment ("Mosko Declaration") are excerpts from the  
12 transcript of the April 25, 2006 deposition of Mark Zuckerberg designated as Highly Confidential by  
13 Plaintiff's pursuant to the Stipulated Protective Order in the Santa Clara County Superior Court action,  
14 Case No. 1:05-CV-047381. Defendants take no position as to whether the deposition testimony of  
15 Mark Zuckerberg is confidential.

16 e. Exhibit C to the Mosko Declaration are excerpts from the transcript of  
17 deposition of Defendant Cameron Winklevoss taken on January 16, 2006 in the Superior Court for the  
18 County of Santa Clara action, Case No. 1:05-CV-047381. This deposition transcript was designated as  
19 Highly Confidential by Defendants pursuant to the Stipulated Protective Order in the Santa Clara  
20 County Superior Court action, Case No. 1:05-CV-047381. This exhibit contains confidential,  
21 proprietary and sensitive business information and should remain sealed from public view.

22 As required by Civil Local Rule 79-5(b), Defendants are lodging with the Clerk copies of  
23 these documents which have been designated "Highly Confidential" and "Confidential" for filing  
24 under seal in their entirety.

25 **SUPPORTING DECLARATION OF SCOTT R. MOSKO**

26 I, Scott R. Mosko, declare as follows:

27 1. I am an attorney admitted to practice in the State of California and the United States  
28 District Court for the Northern District of California, and a partner of Finnegan, Henderson, Farabow,

1 Garrett & Dunner, L.L.P., attorneys of record for Defendants ConnectU LLC, Pacific Northwest  
2 Software, Inc., Winston Williams and Wayne Chang. The matters referred to in this declaration are  
3 based on my personal knowledge and if called as a witness I could, and would, testify competently to  
4 those matters.

5 2. The representations made above in this Administrative Motion are true and correct to  
6 the best of my knowledge and belief.

7 I declare under penalty of perjury under the laws of the United States of America that the  
8 foregoing is true and correct and that this declaration was executed this 6th day of February, 2008, at  
9 Palo Alto, California.

10 By: \_\_\_\_\_ /s/  
11 Scott R. Mosko

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**[PROPOSED] ORDER**

Upon good cause shown, **IT IS HEREBY ORDERED** that the following documents shall be received and filed under seal in their entireties by the Clerk:

1. The highlighted and unredacted version of Defendants ConnectU LLC, Pacific Northwest Software, Inc., Winston Williams and Wayne Chang’s Opposition to Plaintiffs’ Motion for Partial Summary Judgment;

2. The Declaration of Winston Williams in Support of Defendants ConnectU LLC, Pacific Northwest Software, Inc., Winston Williams and Wayne Chang’s Opposition to Plaintiffs’ Motion for Partial Summary Judgment;

3. The Declaration of G. Hunter Jones in Support of Defendants ConnectU LLC, Pacific Northwest Software, Inc., Winston Williams and Wayne Chang’s Opposition to Plaintiffs’ Motion for Partial Summary Judgment;

4. Exhibit B to the Declaration of G. Hunter Jones in Support of Defendants ConnectU LLC, Pacific Northwest Software, Inc., Winston Williams and Wayne Chang’s Opposition to Plaintiffs’ Motion for Partial Summary Judgment;

5. Exhibit A to the Declaration of Scott R. Mosko in Support of Defendants ConnectU LLC, Pacific Northwest Software, Inc., Winston Williams and Wayne Chang’s Opposition to Plaintiffs’ Motion for Partial Summary Judgment;

6. Exhibit C to the Declaration of Scott R. Mosko in Support of Defendants ConnectU LLC, Pacific Northwest Software, Inc., Winston Williams and Wayne Chang’s Opposition to Plaintiffs’ Motion for Partial Summary Judgment.

Dated: \_\_\_\_\_, 2008

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United States Magistrate Judge