

EXHIBIT 9

1 G. HOPKINS GUY, III (State Bar No. 124811)
hopguy@orrick.com
2 I. NEEL CHATTERJEE (State Bar No. 173985)
nchatterjee@orrick.com
3 MONTE COOPER (State Bar No. 196746)
mcooper@orrick.com
4 THERESA A. SUTTON (State Bar No. 211857)
tsutton@orrick.com
5 YVONNE P. GREER (State Bar No. 214072)
ygreer@orrick.com
6 ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
7 Menlo Park, CA 94025
Telephone: 650-614-7400
8 Facsimile: 650-614-7401

9 Attorneys for Plaintiffs
10 THE FACEBOOK, INC. and MARK ZUCKERBERG

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

15 THE FACEBOOK, INC. and MARK
16 ZUCKERBERG,

17 Plaintiffs,

18 v.

19 CONNECTU, INC. (formerly known as
20 CONNECTU, LLC), CAMERON
21 WINKLEVOSS, TYLER WINKLEVOSS,
22 DIVYA NARENDRA, PACIFIC
23 NORTHWEST SOFTWARE, INC.,
24 WINSTON WILLIAMS, WAYNE CHANG,
25 and DAVID GUCWA,

26 Defendants.

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

**FACEBOOK'S FIRST SET OF
REQUESTS FOR PRODUCTION OF
DOCUMENTS TO WINSTON
WILLIAMS**

(REQUEST NOS. 1-99)

1 YOU ARE HEREBY REQUESTED, pursuant to Rule 34 of the Federal Rules of Civil
2 Procedure, to respond to the following requests for production separately and fully, in writing,
3 and under penalty of perjury, within thirty (30) days after service.

4 **DEFINITIONS**

5 1. "FACEBOOK" means, without limitation, TheFacebook, Inc., its past and present
6 parents, subsidiaries, affiliates, predecessors, divisions, officers, directors, trustees, employees,
7 staff members, agents, counsel, representatives, consultants, and ALL persons acting or
8 purporting to act on its behalf.

9 2. "CONNECTU" means defendant ConnectU LLC, ConnectU, Inc., Harvard
10 Connection, and their directors, officers, parents, subsidiaries, predecessors, successors, assigns,
11 agents, servants, employees, investigators, attorneys, AND ALL other persons AND entities
12 representing them, acting on their behalf, or purporting to act on their behalf, including Howard
13 Winklevoss, Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, AND Maria Antonelli.

14 3. "YOU" means defendant Winston Williams, his agents, servants, employees,
15 investigators, attorneys, AND ALL other persons AND entities representing him, acting on his
16 behalf, or purporting to act on his behalf, including Howard Winklevoss, Cameron Winklevoss,
17 Tyler Winklevoss, Divya Narendra, AND Maria Antonelli.

18 4. The term "DOCUMENT" means the original and each non-identical copy of ANY
19 written, printed, typed, recorded, computerized, electronic, taped, graphic, or other matter, in
20 whatever form, whether in final or draft, including but not limited to, ALL materials that
21 constitute "writings" or "recordings" or "photographs" within the broadest meaning of the term
22 "Writing" as defined in California Code of Evidence sections 250, 255, and 260, AND ALL
23 materials that constitute "documents" within the broadest meaning of Rule 34 of the Federal
24 Rules of Civil Procedure. DOCUMENT includes, without limitation, printed matter, electronic
25 mail, materials stored on computer hard drives, diskettes, tapes, ANY other computer media,
26 recorded voice mail messages and ANY other information stored magnetically, optically or
27 electronically.

28 5. "COMMUNICATION" means ANY contact, oral or documentary, formal or

1 informal, at ANY place or under ANY circumstances whatsoever whereby information of ANY
2 nature is transmitted or transferred, including, without limitation, ANY note, memorandum or
3 other record thereof, or a single person seeing or hearing ANY information by ANY means.

4 6. "COMPUTER CODE" means scripts, programs, or other code that YOU
5 developed or in any way participated or assisted in the development thereof, in any computer
6 language (such as "PHP" or "Perl"), used to access thefacebook.com, facebook.com, or any other
7 FACEBOOK server or send email to FACEBOOK users.

8 7. "LAWSUITS" means the following actions: *ConnectU, Inc., Cameron*
9 *Winklevoss, Tyler Winklevoss and Divya Narendra v. Facebook, Inc., Mark Zuckerberg, Eduardo*
10 *Saverin, Dustin Moskovitz, Andrew McCollum, and Facebook LLC* (District of Massachusetts
11 Case No. 1:07-CV-10593-DPW); *ConnectU LLC v. Mark Zuckerberg, Eduardo Saverin, Dustin*
12 *Moskovitz, Andrew McCollum, Christopher Hughes, and TheFacebook.com a/k/a TheFacebook*
13 (District of Massachusetts Case No. 1:04-CV-11923 (DPW)); and *Facebook, Inc. and Mark*
14 *Zuckerberg v. ConnectU, Inc., Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, Pacific*
15 *Northwest Software, Winston Williams, Wayne Chang, and David Gucwa* (Northern District of
16 California Case No. 5:07-CV-01389-RS); *ConnectU LLC v. Mark Zuckerberg, Eduardo Saverin,*
17 *Dustin Moskovitz, Andrew McCollum, Christopher Hughes, and TheFacebook.com a/k/a*
18 *TheFacebook* (First Circuit Court of Appeals Case No. 07-1796)

19 INSTRUCTIONS

20 A. In responding to the following requests, you are required to provide ALL
21 DOCUMENTS that are available to YOU or within YOUR control, including DOCUMENTS in
22 the possession of YOUR attorneys, investigators, employees, agents, representatives, and
23 guardians or any other person acting on YOUR behalf, and not merely DOCUMENTS from
24 YOUR own personal files.

25 B. If YOU object to any of the requests, YOU must state the grounds for any
26 objection(s). If YOU object to only part of a request, YOU must state the objection and the
27 grounds for any objection(s) and respond to the remainder of the request.

28 C. If YOU object to the production of any document on the grounds that it is

1 protected from disclosure by the attorney-client privilege, work-product doctrine, or any other
2 privilege, YOU are requested to identify each document for which the privilege is claimed and
3 give ALL information required by applicable case law, including but not limited to the following:

- 4 a. the name of the writer, sender, or initiator of each copy of
5 the document;
- 6 b. the name of the recipient, addressee, or party to whom any
7 copy of the document was sent;
- 8 c. the date of each copy of the document, if any, or an estimate
9 of its date;
- 10 d. a statement of the basis for the claim of privilege; and
- 11 e. description of the document sufficient for the Court to rule
12 on the applicability and appropriateness of the claimed privilege.

12 REQUESTS FOR PRODUCTION

13 REQUEST FOR PRODUCTION NO. 1:

14 All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO
15 FACEBOOK.

16 REQUEST FOR PRODUCTION NO. 2:

17 All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO
18 CONNECTU.

19 REQUEST FOR PRODUCTION NO. 3:

20 All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO Pacific
21 Northwest Software, pickatime.com, John Taves, Joel Voss, Mike Hayner, Alex Novikov, Alex
22 Shkurop, "PICKATIME\mrprimate," "PICKATIME\mhayner," "PICKATIME\jvoss,"
23 "PICKATIME\jt," and/or "PICKATIME\ashkuropat."

24 REQUEST FOR PRODUCTION NO. 4:

25 All versions of COMPUTER CODE YOU wrote, programmed or helped develop for use
26 by CONNECTU, Cameron Winklevoss, Tyler Winklevoss, or Divya Narendra between
27 February 4, 2003 and the present.
28

1 **REQUEST FOR PRODUCTION NO. 5:**

2 All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO
3 Wayne Chang.

4 **REQUEST FOR PRODUCTION NO. 6:**

5 All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO
6 David Guewa.

7 **REQUEST FOR PRODUCTION NO. 7:**

8 All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO
9 Cameron Winklevoss.

10 **REQUEST FOR PRODUCTION NO. 8:**

11 All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO
12 Tyler Winklevoss.

13 **REQUEST FOR PRODUCTION NO. 9:**

14 All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO
15 Divya Narendra.

16 **REQUEST FOR PRODUCTION NO. 10:**

17 All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO the software
18 program called "Social Butterfly."

19 **REQUEST FOR PRODUCTION NO. 11:**

20 All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO the software
21 program called "Importer."

22 **REQUEST FOR PRODUCTION NO. 12:**

23 All DOCUMENTS concerning or RELATED TO iMarc LLC, Marc Pierrat, Nils Menton,
24 Dave Tufts, Fred LeBlanc, and/or Nick Grant.

25 **REQUEST FOR PRODUCTION NO. 13:**

26 All DOCUMENTS concerning or RELATED TO Mark Zuckerberg.

27 **REQUEST FOR PRODUCTION NO. 14:**

28 All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO Howard

1 Winklevoss, Winklevoss Consultants, Inc., Winklevoss Technologies, RowAmerica LLC, and/or
2 Maria Antonelli.

3 **REQUEST FOR PRODUCTION NO. 15:**

4 All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO Eduardo
5 Saverin, Dustin Moskovitz, Andrew McCollum, and/or Christopher Hughes.

6 **REQUEST FOR PRODUCTION NO. 16:**

7 A copy of all executable versions of COMPUTER CODE YOU developed or helped
8 develop for CONNECTU and/or Pacific Northwest Software.

9 **REQUEST FOR PRODUCTION NO. 17:**

10 All DOCUMENTS that summarize, describe, refer to, or reflect the work YOU performed
11 as identified in PNS0571134-PNS0571149 and PNS01759-PNS01777.

12 **REQUEST FOR PRODUCTION NO. 18:**

13 The police report YOU testified that YOU filed when YOUR rental car was stolen, along
14 with YOUR laptop computer.

15 **REQUEST FOR PRODUCTION NO. 19:**

16 All COMMUNICATIONS to YOU informing YOU of YOUR obligation to preserve all
17 DOCUMENTS and WORK PRODUCT related to CONNECTU between September 2005 and
18 February 2007.

19 **REQUEST FOR PRODUCTION NO. 20:**

20 DOCUMENTS sufficient to show that any computer or electronic device containing any
21 work described in PNS0571149-PNS0571134 and PNS01766-PNS01777 was imaged, copied or
22 otherwise preserved.

23 **REQUEST FOR PRODUCTION NO. 21:**

24 A copy of all engagement letters that evidence the representation of YOU in any lawsuit
25 involving or RELATED TO CONNECTU, Cameron Winklevoss, Tyler Winklevoss, Divya
26 Narendra, Wayne Chang, David Guca, i2hub, Pacific Northwest Software, Howard Winklevoss,
27 Winklevoss Consultants, pickatime.com, FACEBOOK, and/or Mark Zuckerberg.

28 **REQUEST FOR PRODUCTION NO. 22:**

1 All DOCUMENTS that summarize, describe or refer to the LAWSUITS.

2 **REQUEST FOR PRODUCTION NO. 23:**

3 A copy of all DOCUMENTS and things YOU collected, copied, saved, or otherwise
4 preserved in response to the September 22, 2005, subpoena issued to YOU by the Western
5 District of Washington in the District of Massachusetts action entitled *ConnectU LLC v. Mark*
6 *Zuckerberg, et al.* (case number 1:04-CV-11923 (DPW)).

7 **REQUEST FOR PRODUCTION NO. 24:**

8 All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO i2hub and/or
9 i2hub LLC.

10 **REQUEST FOR PRODUCTION NO. 25:**

11 All DOCUMENTS YOU recently analyzed or reviewed for purposes of potentially
12 supplementing YOUR responses to Facebook's interrogatories 3 and 4, as described in YOUR
13 Opposition to Plaintiffs' Motion to Compel (Docket No. 220) including, without limitation, files
14 discovered on servers 207.244.158.164, 207.244.158.165, and 207.244.158.34.

15 **REQUEST FOR PRODUCTION NO. 26:**

16 All DOCUMENTS that summarize, describe, refer to, or constitute efforts or instructions
17 either to YOU and/or by YOU, to preserve DOCUMENTS in response to the December 28, 2006,
18 subpoena issued to YOU by the Superior Court of Washington in the present action, in response
19 to your knowledge of the filing or imminence of one or more LAWSUITS, and/or for any other
20 reason.

21 **REQUEST FOR PRODUCTION NO. 27:**

22 All DOCUMENTS that summarize, describe, refer to, contain, or RELATE TO any proxy
23 server, or list of proxy servers, used in connection with COMPUTER CODE or other work YOU
24 performed for CONNECTU and/or Pacific Northwest Software, including (but not limited to)
25 proxy servers associated with the following IP addresses: 66.96.217.229, 67.131.250.102, and/or
26 67.18.33.226.

27 **REQUEST FOR PRODUCTION NO. 28:**

28 All DOCUMENTS that summarize, describe, refer to, constitute, or RELATE TO any

1 database in which YOU stored email addresses, profile information, log-in credentials, or other
2 information retrieved from any FACEBOOK website, computer or server.

3 **REQUEST FOR PRODUCTION NO. 29:**

4 All DOCUMENTS that summarize, describe, refer to, constitute, or RELATE TO emails
5 sent by or on behalf of YOU, Pacific Northwest Software, pickatime.com, CONNECTU, or
6 iMarc LLC concerning CONNECTU.

7 **REQUEST FOR PRODUCTION NO. 30:**

8 All DOCUMENTS that summarize, describe, refer to, constitute, or RELATE TO any
9 proposal, business plan, work specification or other plan for work YOU were to perform for
10 CONNECTU, whether the work was actually performed or not.

11 **REQUEST FOR PRODUCTION NO. 31:**

12 All COMMUNICATIONS between YOU, CONNECTU, Pacific Northwest Software,
13 pickatime.com, Wayne Chang, iMarc LLC, Ruth Ann Degutis, and/or David Gucwa regarding or
14 RELATING TO FACEBOOK, its website, or the servers it used or accessed.

15 **REQUEST FOR PRODUCTION NO. 32:**

16 All COMMUNICATIONS between YOU, CONNECTU, Pacific Northwest Software,
17 pickatime.com, Wayne Chang, iMarc LLC, Ruth Ann Degutis, and/or David Gucwa regarding or
18 RELATING TO CONNECTU, its website, or the servers it used or accessed.

19 **REQUEST FOR PRODUCTION NO. 33:**

20 All COMMUNICATIONS between YOU, CONNECTU, Pacific Northwest Software,
21 pickatime.com, Wayne Chang, iMarc LLC, Ruth Ann Degutis, and/or David Gucwa regarding or
22 RELATING TO Pacific Northwest Software, any website operated by or for Pacific Northwest
23 Software, or the servers it used or accessed, including (but not limited to) and servers with the
24 URLs www.pnwsoft.com or www.pickatime.com.

25 **REQUEST FOR PRODUCTION NO. 34:**

26 All COMMUNICATIONS between YOU and CONNECTU, Pacific Northwest Software,
27 Howard Winklevoss, Winklevoss Consultants, Winklevoss, Inc., Cameron Winklevoss, Tyler
28 Winklevoss, Divya Narendra, Wayne Chang, Mike Hayner, John Taves, Joel Voss and/or David

1 Gucwa regarding FACEBOOK, its server(s), or FACEBOOK'S website(s).

2 **REQUEST FOR PRODUCTION NO. 35:**

3 All COMMUNICATIONS between YOU and CONNECTU, Pacific Northwest Software,
4 Howard Winklevoss, Winklevoss Consultants, Winklevoss, Inc., Cameron Winklevoss, Tyler
5 Winklevoss, Divya Narendra, Wayne Chang, Joel Voss, Mike Hayner, John Taves, and/or David
6 Gucwa regarding CONNECTU or its website(s).

7 **REQUEST FOR PRODUCTION NO. 36:**

8 All COMMUNICATIONS between YOU and CONNECTU, Pacific Northwest Software,
9 Howard Winklevoss, Winklevoss Consultants, Winklevoss, Inc., Cameron Winklevoss, Tyler
10 Winklevoss, Divya Narendra, Wayne Chang, Joel Voss, Mike Hayner, John Taves, and/or David
11 Gucwa regarding Mark Zuckerberg or the work he performed for HARVARDCONNECTION,
12 CONNECTU, Cameron Winklevoss, Tyler Winklevoss, and/or Divya Narendra.

13 **REQUEST FOR PRODUCTION NO. 37:**

14 All COMMUNICATIONS between YOU and CONNECTU, Howard Winklevoss,
15 Winklevoss Consultants, Winklevoss, Inc., Cameron Winklevoss, Tyler Winklevoss, Divya
16 Narendra, Wayne Chang, David Gucwa, and/or Joel Voss regarding HARVARDCONNECTION
17 or the harvardconnection.com website.

18 **REQUEST FOR PRODUCTION NO. 38:**

19 All COMMUNICATIONS between YOU and Pacific Northwest Software, or any of the
20 employees and consultants to Pacific Northwest Software, including Wayne Chang, John Taves,
21 Joel Voss, Mike Hayner, Alex Novikov, Alex Shkuropat, "PICKATIME\mrprimate,"
22 "PICKATIME\mhayner," "PICKATIME\jvoss," "PICKATIME\jt," and/or
23 "PICKATIME\ashkuropat," or anyone with an email address styled as "_____@pnwsoft.com
24 "or "_____@pickatime.com", regarding CONNECTU and/ or its website(s).

25 **REQUEST FOR PRODUCTION NO. 39:**

26 All COMMUNICATIONS between YOU and iMarc or any of its employees, including
27 Marc Pierrat, Nils Menton, Dave Tufts, Fred LeBlanc, Nick Grant, or anyone with an email
28 address styled as "_____@imarc.net."

1 **REQUEST FOR PRODUCTION NO. 40:**

2 All COMMUNICATIONS regarding any work YOU performed for CONNECTU, Pacific
3 Northwest Software, pickatime.com, Howard Winklevoss, Winklevoss Consultants, Winklevoss
4 Inc., Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, Wayne Chang, David Gucwa,
5 i2hub, and/or Joel Voss, including any development work YOU performed on computer programs
6 variously titled "Social Butterfly," "importer," "Facebook Importer," "grabFacebook.php,"
7 "grabFacebook2.php, "social network spider" or "crawler."

8 **REQUEST FOR PRODUCTION NO. 41:**

9 A copy of all versions of COMPUTER CODE (including, without limitation, source code,
10 object code and scripts) YOU wrote for, or for which YOU were paid by, i2Hub, Pacific
11 Northwest Software, pickatime.com, CONNECTU, Howard Winklevoss, Winklevoss
12 Consultants, Winklevoss, Inc., Maria Antonelli, RowAmerica LLC, Cameron Winklevoss, Tyler
13 Winklevoss, Divya Narendra, Wayne Chang, David Gucwa, i2hub, and/or Joel Voss that was
14 designed to extract information from any website, including thefacebook.com or facebook.com,
15 friendster.com, myspace.com, and/or hi5.com.

16 **REQUEST FOR PRODUCTION NO. 42:**

17 A copy, including an executable copy, of all versions of COMPUTER CODE RELATED
18 TO the script, attached hereto, contained at PNS0002119.

19 **REQUEST FOR PRODUCTION NO. 43:**

20 All documents related to any account YOU created to access any Facebook website,
21 including thefacebook.com and facebook.com.

22 **REQUEST FOR PRODUCTION NO. 44:**

23 All COMMUNICATIONS RELATED TO the script, attached hereto, contained at
24 PNS0002119, including all COMMUNICATIONS concerning the reasons for developing the
25 script, and any results obtained from running such script.

26 **REQUEST FOR PRODUCTION NO. 45:**

27 All documents related to each of the affirmative defenses YOU assert in YOUR answer to
28 the Second Amended Complaint.

1 **REQUEST FOR PRODUCTION NO. 46:**

2 All COMMUNICATIONS concerning or RELATED TO CONNECTU, FACEBOOK, or
3 Mark Zuckerberg with any purported programmer or author of source code for programs hosted
4 by CONNECTU, Harvard Connection and/or www.connectu.com, including (but not limited to)
5 all COMMUNICATIONS with Pacific Northwest Software, Victor Gao, Sanjay Mavinkurve,
6 Joseph Jackson, Wayne Chang, David Gucwa, iMarc LLC, Marc Pierrat, Nils Menton, Dave
7 Tufts, Fred LeBlanc, Nick Grant, John Taves, Joel Voss, Mike Hayner, Alex Novikov, Alex
8 Shkuropat, "PICKATIME\mrprimate," "PICKATIME\mhayner," "PICKATIME\jvoss,"
9 "PICKATIME\jt," and/or "PICKATIME\ashkuropat."

10 **REQUEST FOR PRODUCTION NO. 47:**

11 All COMMUNICATIONS concerning any work designed to integrate the program known
12 as "i2hub" with CONNECTU.

13 **REQUEST FOR PRODUCTION NO. 48:**

14 All COMMUNICATIONS in Instant Messaging format concerning CONNECTU,
15 Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, Howard Winklevoss, Winston
16 Williams, David Gucwa, Winklevoss Consultants, RowAmerica LLC, and/or Maria Antonelli.

17 **REQUEST FOR PRODUCTION NO. 49:**

18 All COMMUNICATIONS using Instant Messaging format, including (but not limited to)
19 all COMMUNICATIONS using the AOL Instant Messenger ("AIM") "user name "rrmrprim8,"
20 concerning CONNECTU, PACIFIC NORTHWEST SOFTWARE, Cameron Winklevoss, Tyler
21 Winklevoss, Divya Narendra, Howard Winklevoss, Wayne Chang, David Gucwa, Winklevoss
22 Consultants, RowAmerica LLC, i2hub, and/or Maria Antonelli.

23 **REQUEST FOR PRODUCTION NO. 50:**

24 All COMMUNICATIONS in Instant Messaging format, including (but not limited to) all
25 COMMUNICATIONS using the AOL Instant Messenger ("AIM") "user name "rrmrprim8,"
26 concerning FACEBOOK, Mark Zuckerberg, Christopher Hughes, Dustin Moskovitz, Eduardo
27 Saverin, and/or Andrew McCollum.

1 **REQUEST FOR PRODUCTION NO. 51:**

2 All COMMUNICATIONS with i2hub or Ruth Ann Degutis concerning FACEBOOK
3 and/or CONNECTU.

4 **REQUEST FOR PRODUCTION NO. 52:**

5 All COMMUNICATIONS and DOCUMENTS concerning the that refer to the source
6 (*i.e.*, the name of the person who provided the information to YOU) and identity (*i.e.*, the name of
7 the person who created the log-in name and password provided to YOU) for all log-ins and
8 passwords YOU, CONNECTU, Pacific Northwest Software, www.pickatime.com, i2hub or
9 anyone on YOUR behalf used to access the FACEBOOK website, including (but not limited to)
10 the source and identity for all of the following logins and/or passwords: (a) zuzana@bu.edu &
11 password "123"; (b) sj391@columbia.edu & password "east"; (c) lbowman@wellesley.edu &
12 password "Divya"; (d) rdegutis@student.umass.edu & password "ruth1783"; (e) r16@duke.edu
13 & password "nacho"; (f) mjhall@fas.harvard.edu & password "hallmark"; (g)
14 bolger@umich.edu & password "bolger"; (h) maria.rocha_oliviera@tufts.edu & password
15 "maria"; (i) Christopher.librandi@yale.edu & password "christoph"; (j) jm245@cornell.edu &
16 password "fishapple"; (k) yee@bu.edu and password "ab1036"; (l) barroreu@bc.edu &
17 password "eutychius"; (m) Beelzebub@brown.edu & password "asdfgh"; (n)
18 hoganc@alum.mit.edu & password "csfb"; (o) porcella@princeton.edu & password "angelo";
19 (p) carlsson@stanford.edu & password "fake_pwd"; (q) Stinab8@ucla.edu & password "divya";
20 (r) sen4@georgetown.edu & password "sexyrena"; (s) singer.d@neu.edu & password "1211"; (t)
21 mj405@nyu.edu & password "rajubros"; (u) porcella@princeton.edu & password "frankmaria";
22 (v) cmg25@georgetown.edu & password "top59gun"; (w) sk1281@columbia.edu & password
23 "khalid1" and (x) jhn2102@columbia.edu & password "onitsuka."

24 **REQUEST FOR PRODUCTION NO. 53:**

25 All COMMUNICATIONS concerning the development of all computer databases (or
26 specific database schemas, tables, modules, procedures, scripts or sub-routines) that YOU, Pacific
27 Northwest Software, www.pickatime.com, CONNECTU, iMarc LLC or i2hub developed or in
28 any way participated or assisted in the development thereof, in any computer language (such as

1 "PHP," "html," "SQL" or "Perl"), which computer databases (or specific database schemas,
2 tables, modules, procedures, scripts or sub-routines) were used to store communications with
3 FACEBOOK users or to store information downloaded or received from thefacebook.com,
4 facebook.com, or any other FACEBOOK server. Such computer databases, schemas, tables,
5 modules, procedures, scripts or sub-routines include, but are not limited to, any computer
6 programs associated with the names "profile importer," "profile grabber," "importer," "Facebook
7 importer," "crawler," "grabFacebook.php," "grabFacebook2.php," "importer.i2hub.com,"
8 "import system" and/or "Social Butterfly."

9 **REQUEST FOR PRODUCTION NO. 54:**

10 All COMMUNICATIONS or DOCUMENTS reflecting any computer database(s) (or
11 specific database schema(s), table(s), module(s), procedure(s), script(s) or sub-routine(s)) used to
12 send email to FACEBOOK USERS on behalf of CONNECTU, Pacific Northwest Software,
13 www.pickatime.com, iMarc LLC, and/or i2hub. Such computer databases, schemas, tables,
14 modules, procedures, scripts or sub-routines include, but are not limited to, any computer
15 programs associated with the names "profile importer," "profile grabber," "importer," "Facebook
16 importer," "crawler," "grabFacebook.php," "grabFacebook2.php," "importer.i2hub.com,"
17 "import system" and/or "Social Butterfly."

18 **REQUEST FOR PRODUCTION NO. 55:**

19 All COMMUNICATIONS or DOCUMENTS associated with, concerning, reflecting, or
20 RELATED TO the following uniform resource locators: (a) <http://dev.connectu.com/importer>;
21 (b) <http://www.connectu.com/importer>; (c) <http://cu.pnwsoft.com/import>;
22 (d) www3.pickatime.com; (e) cu.pnwsoft.com; (f) ch.pnwsoft.com; (g) www.pnwsoft.com;
23 (h) jtpnwsoft.com; (i) db.pickatime.com; (j) hop.pickatime.com; (k)
24 <http://www.i2hub.com/dgucwa/face>; (l) www.i2hubdgucwa/face; (m) unix15.dmbhosting.com;
25 (n) webconnectu.com; and/or (o) wwpnwsoft.com.

26 **REQUEST FOR PRODUCTION NO. 56:**

27 All DOCUMENTS sufficient to IDENTIFY electronic communication accounts from
28 which YOU performed work for PACIFIC NORTHWEST SOFTWARE and/or CONNECTU.

1 “Electronic communication accounts” means accounts used to facilitate electronic
2 communications, including: email addresses (e.g., “mrprimate@pick_a_time.com,”
3 mrpimate@pnwsoft.com, etc.); instant messaging accounts offered by sites such as America On-
4 Line, Yahoo! and ConnectU (e.g., “rrmrprim8” on AOL Instant Messenger (“AIM”), etc.);
5 registered user account names and passwords for Internet-based services, bulletin boards,
6 chatrooms, blogs, e-mail, and world-wide-websites that permit person-to-person electronic
7 communication (e.g., login identifier lbowman@wellesley.edu and password “Divya” for access
8 to social networks like www.facebook.com, www.friendster.com, www.hi5.com,
9 www.myspace.com, and www.connectu.com); and/or computer IP addresses for computers
10 through which electronic communications were performed on behalf of PACIFIC NORTHWEST
11 SOFTWARE and/or CONNECTU (e.g., personal IP address 24.22.165.112, PNS server
12 207.244.158.164, etc.). YOUR response should specifically IDENTIFY the relevant screen
13 name, email address, domain name, login identifier, account name, password, and/or IP address
14 by date of use.

15 **REQUEST FOR PRODUCTION NO. 57:**

16 All COMMUNICATIONS or DOCUMENTS concerning or RELATED TO the use of
17 any server, including proxy server, to access FACEBOOK’s server(s) or website(s), including
18 (but not limited to) copies of ALL COMMUNICATIONS concerning or RELATED TO the use
19 of any computer possessing or assigned the following IP addresses: 24.22.165.112;
20 24.34.190.94; 69.13.181.29; 192.168.0.35; 199.98.29.103; 128.227.95.113; 207.244.158.164;
21 207.114.225.164; 207.244.158.165; 207.244.158.34; 216.127.32.54; and/or 216.127.32.228.

22 **REQUEST FOR PRODUCTION NO. 58:**

23 All COMMUNICATIONS or DOCUMENTS associated with, concerning, or RELATED
24 TO any database schema or tables maintained for or on behalf of CONNECTU, including (but not
25 limited to) the database schema or table hosted at any of the following IP addresses and called
26 “connectu”: 24.22.165.112; 24.34.190.94; 69.13.181.29; 192.168.0.35; 199.98.29.103;
27 128.227.95.113; 207.244.158.164; 207.114.225.164; 207.244.158.165; 207.244.158.34;
28 216.127.32.54; and/or 216.127.32.228.

1 **REQUEST FOR PRODUCTION NO. 59:**

2 All COMMUNICATIONS or DOCUMENTS concerning or RELATED TO the sending
3 of emails or solicitations to join CONNECTU to any user of FACEBOOK from computers
4 possessing or assigned the following IP addresses: 24.22.165.112; 24.34.190.94; 69.13.181.29;
5 192.168.0.35; 199.98.29.103; 128.227.95.113; 207.244.158.164; 207.114.225.164;
6 207.244.158.165; 207.244.158.34; 216.127.32.54; and/or 216.127.32.228.

7 **REQUEST FOR PRODUCTION NO. 60:**

8 All COMMUNICATIONS or DOCUMENTS associated with, concerning or RELATED
9 TO the database and COMPUTER CODE stored in a "Subversion" version control system
10 available at the following uniform resource locators: <http://db.pickatime.com:900/svn/Connect>,
11 <http://db.pickatime.com:900/svn/connect/ConnectU>, and/or <http://cu.pnwsoft.com>.

12 **REQUEST FOR PRODUCTION NO. 60:**

13 All COMMUNICATIONS or DOCUMENTS associated with development of any
14 COMPUTER CODE associated with, concerning, or RELATED to CONNECTU and/or
15 FACEBOOK, in which the author is identified by the name "PICKATIME\mrprimate,"
16 "PICKATIME\mhayner," "PICKATIME\jvoss," "PICKATIME\jt," and/or
17 "PICKATIME\ashkuropat."

18 **REQUEST FOR PRODUCTION NO. 61:**

19 All COMMUNICATIONS or DOCUMENTS available in the mysql database
20 "i2hub.com" associated with, concerning or RELATED TO CONNECTU, FACEBOOK, Mark
21 Zuckerberg, Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, Howard Winklevoss,
22 David Guca, Pacific Northwest Software, www.pickatime.com, Victor Gao, Sanjay
23 Mavinkurve, Joseph Jackson, Winston Williams, iMarc LLC, Marc Pierrat, Nils Menton, Dave
24 Tufts, Fred LeBlanc, Nick Grant, John Taves, Joel Voss, Alex Novikov, Alex Shkuropat,
25 "PICKATIME\mrprimate," "PICKATIME\mhayner," "PICKATIME\jvoss," "PICKATIME\jt,"
26 and/or "PICKATIME\ashkuropat."

27 **REQUEST FOR PRODUCTION NO. 62:**

28 All COMMUNICATIONS or DOCUMENTS concerning any complaints from users of

1 the FACEBOOK website concerning the receipt of emails, SPAM, solicitations, or invitations to
2 join the CONNECTU website.

3 **REQUEST FOR PRODUCTION NO. 63:**

4 All COMMUNICATIONS or DOCUMENTS concerning any complaints from users of
5 any website, college, business, or social network concerning the receipt of emails, SPAM,
6 solicitations, or invitations to join the CONNECTU website, including complaints from (but not
7 limited to) users of the websites www.myspace.com, www.friendster.com, or www.hi5.com.

8 **REQUEST FOR PRODUCTION NO. 64:**

9 All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE,
10 concerning or RELATED TO the "ConnectU Profile Importer" referenced on the attached "Social
11 Butterfly" document with the Bates-number PNS02096.

12 **REQUEST FOR PRODUCTION NO. 65:**

13 All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE,
14 concerning or RELATED TO the "Profile Grabber" referenced on the attached "Social Butterfly"
15 document with the Bates-number PNS02096.

16 **REQUEST FOR PRODUCTION NO. 66:**

17 All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE,
18 concerning or RELATED TO the "Prox(ies)" referenced on the attached "Social Butterfly"
19 document with the Bates-number PNS02096.

20 **REQUEST FOR PRODUCTION NO. 67:**

21 All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE,
22 concerning or RELATED TO the "Crawler" referenced on the attached "Social Butterfly"
23 document with the bates-number PNS02096.

24 **REQUEST FOR PRODUCTION NO. 68:**

25 All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE,
26 concerning or RELATED TO the "Friends List" referenced on the attached "Social Butterfly"
27 document with the Bates-number PNS02096
28

1 **REQUEST FOR PRODUCTION NO. 69:**

2 All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE,
3 concerning or RELATED TO the "Cache" referenced on the attached "Social Butterfly"
4 document with the Bates-number PNS02096.

5 **REQUEST FOR PRODUCTION NO. 70:**

6 All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE,
7 concerning or RELATED TO the "Email Queue" referenced on the attached "Social Butterfly"
8 document with the Bates-number PNS02096.

9 **REQUEST FOR PRODUCTION NO. 71:**

10 All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE,
11 concerning or RELATED TO the "Friend Request" referenced on the attached "Social Butterfly"
12 document with the Bates-number PNS02096.

13 **REQUEST FOR PRODUCTION NO. 72:**

14 All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE,
15 concerning or RELATED TO all statements and statistics contained in YOUR attached May 10,
16 2005 email (CUCA02972).

17 **REQUEST FOR PRODUCTION NO. 73:**

18 All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE,
19 concerning or RELATED TO how the statistics contained in YOUR attached May 10, 2005 email
20 (CUCA02972) were calculated.

21 **REQUEST FOR PRODUCTION NO. 74:**

22 All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE,
23 concerning or RELATED TO the sources of all information contained in YOUR attached May
24 10, 2005 email (CUCA02972), including all database information used to generate the
25 information.

26 **REQUEST FOR PRODUCTION NO. 75:**

27 All DOCUMENTS, contracts, insurance policies, indemnity agreements, or similar
28 agreements associated with YOUR work on behalf of CONNECTU, Pacific Northwest Software,

1 www.pickatime.com, i2hub, Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, Howard
2 Winklevoss, Wayne Chang, David Guca, Winklevoss Consultants, and/or RowAmerica LLC, to
3 the extent YOU contend such DOCUMENT, contract, insurance policy, indemnity agreement, or
4 similar agreement obligates CONNECTU, Pacific Northwest Software, www.pickatime.com,
5 i2hub, Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, Howard Winklevoss, Wayne
6 Chang, David Guca, Winklevoss Consultants, and/or RowAmerica LLC to pay all or part of any
7 portions of damages, costs, or attorneys fees in any of the LAWSUITS.

8 **REQUEST FOR PRODUCTION NO. 76:**

9 All DOCUMENTS reflecting the value of any services YOU rendered on behalf of any of
10 CONNECTU, Pacific Northwest Software, www.pickatime.com, i2hub, Cameron Winklevoss,
11 Tyler Winklevoss, Divya Narendra, Howard Winklevoss, Wayne Chang, David Guca,
12 Winklevoss Consultants, and/or RowAmerica LLC.

13 **REQUEST FOR PRODUCTION NO. 77:**

14 All DOCUMENTS reflecting any agreement or contract for YOU to perform services on
15 behalf of any of CONNECTU, Pacific Northwest Software, www.pickatime.com, i2hub,
16 Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, Howard Winklevoss, David Guca,
17 Winklevoss Consultants, and/or RowAmerica LLC.

18 **REQUEST FOR PRODUCTION NO. 78:**

19 All DOCUMENTS reflecting the dates and number of invitations sent by CONNECTU to
20 users of FACEBOOK to join the CONNECTU website.

21 **REQUEST FOR PRODUCTION NO. 79:**

22 All DOCUMENTS reflecting any actual or attempted transfer, migration or integration of
23 databases or COMPUTER CODE available at Pacific Northwest Software, iMarc,
24 www.pickatime.com, stallscribbles.com, and/or i2hub.com with or to any server or computer
25 maintained for or on behalf of CONNECTU.

26 **REQUEST FOR PRODUCTION NO. 80:**

27 All DOCUMENTS reflecting YOUR dates of employment at or consulting for Pacific
28 Northwest Software.

1 **REQUEST FOR PRODUCTION NO. 81:**

2 All DOCUMENTS reflecting YOUR dates of employment at or consulting for
3 CONNECTU.

4 **REQUEST FOR PRODUCTION NO. 82:**

5 All DOCUMENTS reflecting YOUR dates of employment at or consulting for any entity
6 bearing the name "Winklevoss" in its title, or associated with Howard Winklevoss.

7 **REQUEST FOR PRODUCTION NO. 83:**

8 All DOCUMENTS or COMMUNICATIONS concerning this litigation to the extent such
9 DOCUMENTS or COMMUNICATIONS do not evidence communications between YOU and
10 YOUR litigation counsel after they began to represent YOU.

11 **REQUEST FOR PRODUCTION NO. 84:**

12 All DOCUMENTS reflecting any investment, or proposed investment, by YOU in
13 CONNECTU.

14 **REQUEST FOR PRODUCTION NO. 85:**

15 All DOCUMENTS reflecting any investment, or proposed investment, in CONNECTU by
16 PERSONS other than YOU.

17 **REQUEST FOR PRODUCTION NO. 86:**

18 All DOCUMENTS reflecting any effort(s) or attempt(s) by YOU to promote or market the
19 CONNECTU website.

20 **REQUEST FOR PRODUCTION NO. 87:**

21 All DOCUMENTS reflecting any effort(s) or attempt(s) by CONNECTU, Cameron
22 Winklevoss, Tyler Winklevoss, Divya Narendra, Howard Winklevoss, Winklevoss Consultants,
23 RowAmerica LLC, Victor Gao, Sanjay Mavinkurve, Joseph Jackson, David Gucwa, Joel Voss,
24 John Taves, Wayne Chang, and/or iMarc to promote or market the CONNECTU website.

25 **REQUEST FOR PRODUCTION NO. 88:**

26 All DOCUMENTS reflecting any effort(s) or attempt(s) by Pacific Northwest Software or
27 www.pickatime.com to promote or market the CONNECTU website.

1 **REQUEST FOR PRODUCTION NO. 89:**

2 An electronic image of the entire computer hard drive(s) or other computer memory
3 devices controlled and used by YOU or any of YOUR agents, employees, assignees or
4 consultants, to the extent that computer was used to communicate regarding or reflects the
5 creation or development of the COMPUTER CODE, or any software reflecting the creation,
6 development and operation of the ConnectU website, the Social Butterfly program, or the
7 Facebook Importer program.

8 **REQUEST FOR PRODUCTION NO. 90:**

9 All DOCUMENTS reflecting the date(s) of operation and execution of any computer
10 program, source code or script designed to obtain for CONNECTU email addresses, profile
11 information, course information, images, or other data from the FACEBOOK website(s).

12 **REQUEST FOR PRODUCTION NO. 91:**

13 All DOCUMENTS reflecting, associated with, or RELATING TO any of YOUR
14 responses to Interrogatories in this action.

15 **REQUEST FOR PRODUCTION NO. 92:**

16 All DOCUMENTS reflecting, associated with, or RELATING TO the dates of operation
17 of the programs known as "Social Butterfly," "importer," "Facebook Importer,"
18 "grabFacebook.php," "grabFacebook2.php," "social network spider" or "crawler."

19 **REQUEST FOR PRODUCTION NO. 93:**

20 All DOCUMENTS reflecting, associated with, or RELATED TO the deletion or
21 overwriting by YOU, CONNECTU, Pacific Northwest Software, www.pickatime, David Gucwa,
22 Wayne Chang, Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, and/or Howard
23 Winkleovss, of any information (including database information) concerning the identities of
24 FACEBOOK users whose email addresses or profile information originally was obtained as a
25 result of the operation of the programs known as "Social Butterfly," "importer," "Facebook
26 Importer," "grabFacebook.php," "grabFacebook2.php," "social network spider" or "crawler."

27 **REQUEST FOR PRODUCTION NO. 94:**

28 All DOCUMENTS reflecting, associated with or RELATED TO instructions by

1 CONNECTU, Pacific Northwest Software, www.pickatime, David Gucwa, Wayne Chang,
2 Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, and/or Howard Winkleovss to cease
3 operation of the programs known as “Social Butterfly,” “importer,” “Facebook Importer,”
4 “grabFacebook.php,” “grabFacebook2.php,” “social network spider” or “crawler.”

5 **REQUEST FOR PRODUCTION NO. 95:**

6 All DOCUMENTS reflecting, associated with or RELATED TO any FACEBOOK ID
7 table created to store the identities of Facebook users whose profile or other information were
8 imported by YOU, CONNECTU, Pacific Northwest Software, www.pickatime, David Gucwa,
9 Wayne Chang, Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, and/or Howard
10 Winkleovss.

11 **REQUEST FOR PRODUCTION NO. 96:**

12 All DOCUMENTS reflecting, associated with or RELATED TO any table called or
13 referred to as “facebook_id table” by YOU, CONNECTU, Pacific Northwest Software,
14 www.pickatime, David Gucwa, Wayne Chang, Cameron Winklevoss, Tyler Winklevoss, Divya
15 Narendra, and/or Howard Winkleovss.

16 **REQUEST FOR PRODUCTION NO. 97:**

17 One executable copy of each version of COMPUTER CODE developed by YOU,
18 CONNECTU, Pacific Northwest Software, Howard Winklevoss, Winklevoss Consultants,
19 Winklevoss, Inc., Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, Wayne Chang, Joel
20 Voss, Mike Hayner, John Taves, and/or David Gucwa, which COMPUTER CODE contains the
21 programs known as “Social Butterfly,” “importer,” “Facebook Importer,” “grabFacebook.php,”
22 “grabFacebook2.php,” “social network spider” or “crawler.”

23 **REQUEST FOR PRODUCTION NO. 98:**

24 All DOCUMENTS regarding services, including hosting services, provided to YOU by
25 Pick-A-Time.

26 **REQUEST FOR PRODUCTION NO. 99:**

27 DOCUMENTS sufficient to identify any web hosting company or data center through
28 which YOU, Pacific Northwest Software, Pick-a-Time, CONNECTU, or i2Hub stored

1 COMPUTER CODE.

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3 Dated: November 21, 2007

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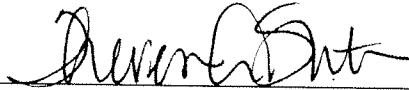
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ORRICK, HERRINGTON & SUTCLIFFE LLP



Theresa A. Sutton
Attorneys for Plaintiffs
THE FACEBOOK, INC. and MARK
ZUCKERBERG

1 G. HOPKINS GUY, III (State Bar No. 124811)
hopguy@orrick.com
2 I. NEEL CHATTERJEE (State Bar No. 173985)
nchatterjee@orrick.com
3 MONTE COOPER (State Bar No. 196746)
mcooper@orrick.com
4 THERESA A. SUTTON (State Bar No. 211857)
tsutton@orrick.com
5 YVONNE P. GREER (State Bar No. 214072)
ygreer@orrick.com
6 ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
7 Menlo Park, CA 94025
Telephone: 650-614-7400
8 Facsimile: 650-614-7401

9 Attorneys for Plaintiffs
10 THE FACEBOOK, INC. and MARK ZUCKERBERG

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

14
15 THE FACEBOOK, INC. and MARK
ZUCKERBERG,

16 Plaintiffs,

17 v.

18 CONNECTU, INC. (formerly known as
19 CONNECTU, LLC), CAMERON
WINKLEVOSS, TYLER WINKLEVOSS,
20 DIVYA NARENDRA, PACIFIC
NORTHWEST SOFTWARE, INC.,
21 WINSTON WILLIAMS, WAYNE CHANG,
and DAVID GUCWA,

22 Defendants.
23

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

PROOF OF SERVICE VIA U.S. MAIL

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27
28

1 **PROOF OF SERVICE**

2 I am a resident of the State of California and over the age of eighteen years, and not a
3 party to the within action. On November 21, 2007, I served the within document(s):

- 4 **1. FACEBOOK’S FIRST SET OF REQUESTS FOR PRODUCTION OF**
- 5 **DOCUMENTS TO PACIFIC NORTHWEST SOFTWARE;**
- 6 **2. FACEBOOK’S FIRST SET OF REQUESTS FOR PRODUCTION OF**
- 7 **DOCUMENTS TO WINSTON WILLIAMS.**

8	By transmitting via facsimile the document(s) listed above to the fax number(s) set forth below before 5:30 p.m. on November 21, 2007.
9	X By placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Menlo Park, California addressed as set forth below on November 21, 2007.
10	By placing a true and correct copy of the document(s) in a Federal Express envelope addressed as set forth below and then sealing the envelope, affixing a pre-paid Federal Express air bill, and causing the envelope to be delivered to a Federal Express agent for delivery.
11	By causing personal delivery by [COURIER SERVICE NAME HERE] of the document(s) listed above to the person(s) at the address(es) set forth below. **NOTE: REQUIRES EXECUTED POS FROM COURIER SERVICE**
12	
13	
14	

15
16 Scott Mosko, Esq.
Lily Lim, Esq.
17 **Finnegan, Henderson, Farabow,**
Garrett & Dunner, LLP
18 **3300 Hillview Avenue**
19 **Palo Alto, California 94304-1203**
Telephone: (650) 849-6600
20 **Facsimile: (650) 849-6666**

Valerie M. Wagner, Esq.
Dechert LLP
2440 W. El Camino Real, Suite 700
Mountain View, California 94040
Telephone: (650) 813-4800
Facsimile: (650) 813-4848

21 **ATTORNEYS FOR DEFENDANTS**
CONNECTU INC., CAMERON
22 **WINKLEVOSS, TYLER WINKLEVOSS,**
DIVYA NARENDRA, PACIFIC
23 **NORTHWEST SOFTWARE, INC.,**
24 **WINSTON WILLIAMS, WAYNE CHANG**

ATTORNEYS FOR DEFENDANT DAVID
GUCWA

25 I am readily familiar with my firm’s practice for collection and processing correspondence
26 for mailing in the United States Postal Service, to wit, that correspondence be deposited with the
27 United States Postal Service this same day in the ordinary course of business.

28 Executed on November 21, 2007 at Menlo Park, California. I declare under penalty of

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perjury under the laws of the State of California that the foregoing is true and correct.



Theresa A. Sutton