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9 Attorneys for Plaintiffs  
 FACEBOOK, INC. and MARK ZUCKERBERG

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

15 FACEBOOK, INC. and MARK  
 ZUCKERBERG,  
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 Plaintiffs,  
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 v.  
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 19 CONNECTU, INC. (formerly known as  
 CONNECTU, LLC), CAMERON  
 WINKLEVOSS, TYLER WINKLEVOSS,  
 20 DIVYA NARENDRA, PACIFIC  
 NORTHWEST SOFTWARE, INC.,  
 21 WINSTON WILLIAMS, WAYNE CHANG  
 AND DOES 1-25,  
 22  
 Defendants.  
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Case No. 5:07-CV-01389-RS

**DECLARATION OF YVONNE  
 GREER SUBMITTING  
 SUPPLEMENTAL EVIDENCE IN  
 SUPPORT OF PLAINTIFFS'  
 MOTION FOR PARTIAL SUMMARY  
 JUDGMENT [DOC. 251] AND  
 MOTION TO COMPEL  
 COMPLIANCE BY PACIFIC  
 NORTHWEST SOFTWARE AND  
 WINSTON WILLIAMS [DOC. 271]**

Date: February 27, 2008  
 Time: 9:30 A.M.  
 Judge: Hon. Richard Seeborg

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1 I, Yvonne P. Greer, declare as follows:

2 1. I am an associate at the law firm of Orrick, Herrington & Sutcliffe, counsel for  
3 Plaintiffs Facebook, Inc. and Mark Zuckerberg in this action, and a member of the Bar of the  
4 State of California. I make this declaration in support of Plaintiffs' Motion For Partial Summary  
5 Judgment Re Defendants' Liability Pursuant To California Penal Code Section 502(C) And 15  
6 U.S.C. § 7704(A)(1) And 15 U.S.C. § 7704(B)(1) [Doc. 251] ("MSJ") and Motion To Compel  
7 Compliance By Defendants Pacific Northwest Software And Winston Williams With Order  
8 Granting Motion To Compel Supplemental Interrogatory Responses [Doc. 271] ("Motion to  
9 Compel Compliance"). I make this declaration of my own personal knowledge and, if called as a  
10 witness, I could and would testify competently to the truth of the matters set forth herein.

11 2. Pacific Northwest Software ("PNS") purportedly sent supplemental documents in  
12 response to Plaintiffs' document requests on the day replies were due in support of Plaintiffs'  
13 MSJ and Motion To Compel Compliance. Attached hereto as **Exhibit A** is a true and correct  
14 copy of correspondence received from PNS with its supplemental production of documents, dated  
15 February 13, 2008. Plaintiffs did not receive PNS' supplemental document production until  
16 February 18, 2008, five days after briefing on the pending motions was completed.

17 3. The following documents were contained in PNS' supplemental production and  
18 provide further support to Plaintiffs' MSJ and Motion To Compel.

19 4. Attached hereto as **Exhibit B** is a true and correct copy of a document bearing  
20 production numbers PNS0600661-663. This document was produced by PNS to Plaintiffs in this  
21 action in response to a Rule 34 Request for Production of Documents. **[CONFIDENTIAL**  
22 **DOCUMENT SUBMITTED SEPARATELY UNDER SEAL].**

23 5. Attached hereto as **Exhibit C** is a true and correct copy of a document bearing  
24 production numbers PNS0598676-678. This document was produced by PNS to Plaintiffs in this  
25 action in response to a Rule 34 Request for Production of Documents. **[CONFIDENTIAL**  
26 **DOCUMENT SUBMITTED SEPARATELY UNDER SEAL].**

27 6. Attached hereto as **Exhibit D** is a true and correct copy of a document bearing  
28 production numbers PNS0602084-2086. This document was produced by PNS to Plaintiffs in

1 this action in response to a Rule 34 Request for Production of Documents. [**CONFIDENTIAL**  
2 **DOCUMENT SUBMITTED SEPARATELY UNDER SEAL**].

3 I declare under penalty of perjury that the forgoing is true and correct to the best of my  
4 knowledge. Executed this 22nd of February, 2008, at Menlo Park, California.

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/s/ Yvonne P. Greer /s/  
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Yvonne P. Greer

