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| 11 UNITED STATES DISTRICT COURT | |
| 12 NORTHERN DISTRICT OF CALIFORNIA | |
| SAN JOSE DIVISION | |
| SANJ | |
| THE FACEBOOK INC and MARK | |
| ZUCKERBERG | Case No. 5:07-CV-01389-JW |
| Plaintiffs, | DECLARATION OF KALAMA M. |
| V. | LUI-KWAN IN SUPPORT OF ADMINISTRATIVE MOTION BY |
| CONNECTU, INC. (formerly known as CONNECTU LLC) PACIFIC | NON-PARTIES R. GREGORY ROUSSEL AND FENWICK & WEST |
| NORTHWEST SOFTWARE, INC., | LLP TO SEAL DOCUMENTS |
| CHANG, | |
| Defendants. | |
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| DECL. ISO MOTION TO SEAL | CASE NO. 5:07-CV-01389-JW |
| | FENWICK & WEST LLP Silicon Valley Center 801 California Street Mountain View, CA 94041 Telephone: (650) 988-8500 Facsimile: (650) 938-5200 tbaker@fenwick.com KALAMA M. LUI-KWAN (CSB NO. 2421 FENWICK & WEST LLP 555 California Street, 12th Floor San Francisco, CA 94104 Telephone: (415) 875-2300 Facsimile: (415) 281-1350 klui-kwan@fenwick.com Attorneys for Non-Parties Fenwick & West LLP and R. Gregory Roussel UNITED STAT NORTHERN DIS SAN JØ THE FACEBOOK, INC. and MARK ZUCKERBERG Plaintiffs, v. CONNECTU, INC. (formerly known as CONNECTU, INC. (formerly known as CONNECTU, INC. (formerly known as CONNECTU, INC., PACIFIC NORTHWEST SOFTWARE, INC., WINSTON WILLIAMS, and WAYNE CHANG, Defendants. |

1 2 I, Kalama M. Lui-Kwan, declare as follows:

I am an attorney duly admitted to practice in California and before this Court. I
 am associated with the law firm of Fenwick & West LLP and counsel for R. Gregory Roussel and
 Fenwick & West LLP (together, "Fenwick"). I have personal knowledge of the facts stated below
 and, if called as a witness, I could testify competently to such facts. I make this declaration
 pursuant to Civil L.R. 7-11 and 79-5(b), and in support of Fenwick's Administrative Motion to
 Seal Documents ("Administrative Motion").

8 2. Good cause exists for sealing: (1) Reply in Support of Motion to Quash and for
9 Protective Order; and (2) Corrected Declaration of Kalama M. Lui-Kwan in Support of Motion to
10 Quash ("Reply Papers").

3. Upon information and belief, the parties in this action entered into, and the California Superior Court issued, a Stipulated Protective Order on January 23, 2006, which prohibits either party from filing in the public record any documents that have been designated as "Confidential" or "Highly Confidential" pursuant to the Protective Order. Although Fenwick is not a party to this action, it has represented plaintiff Facebook, Inc. ("Facebook") in connection with certain matters related to Facebook's settlement of this action.

4. The Reply Papers contain confidential information that is subject to the protection
in the protective order. In light of the high-profile nature of this case, and the parties' desire to
keep the details of these documents private, Fenwick requests that the Reply Papers remain
sealed. The subject matter discussed in these papers includes commercially sensitive and
confidential information that, if released to the general public, will adversely affect the parties to
this litigation.

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5. The Administrative Motion is being made pursuant to Civil L.R. 79-5, which requires a Court order to seal documents and does not permit sealing by stipulation.

I declare under penalty of perjury under the laws of the United States of America that the
foregoing is true and correct. Executed this 9th day of June 2008 at San Francisco, California.

By: /s/ Kalama M. Lui-Kwan Kalama M. Lui-Kwan

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