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15 Attorneys for Intervenors
 16 Cameron Winklevoss, Tyler Winklevoss,
 17 and Divya Narendra

18 UNITED STATES DISTRICT COURT
 19 NORTHERN DISTRICT OF CALIFORNIA
 20 SAN JOSE DIVISION

21 THE FACEBOOK, INC. and MARK
 22 ZUCKERBERG,

23 Plaintiffs,

24 v.

25 CONNECTU, INC. (formerly known as
 26 CONNECTU, LLC), PACIFIC NORTHWEST
 27 SOFTWARE, INC., WINSTON WILLIAMS,
 28 and WAYNE CHANG,

Defendants.

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

**DECLARATION OF SEAN O'SHEA IN
 SUPPORT OF ADMINISTRATIVE
 MOTION TO SEAL UNREDACTED
 THIRD PARTY COMPLAINT**

1 I, Sean O'Shea, declare as follows:

2 1. I am a member of the law firm of O'Shea Partners LLP, 90 Park Avenue,
3 New York, New York 10016, counsel for Cameron Winklevoss, Tyler Winklevoss and
4 Divya Narendra and counsel for defendant ConnectU in the above matter. I make this
5 Declaration pursuant to Civil L.R. 7-11 and 79-5(b).

6 2. Good cause exists for sealing the unredacted Third Party Complaint, as it
7 references terms from the mediation term sheet that Judge Ware has redacted from public
8 filings, and references information that Plaintiffs have alleged is confidential.¹

9 3. A redacted version of the complaint was electronically filed on July 31,
10 2008, and is available to the public (Docket No. 577).

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

14
15 I declare under penalty of perjury that the foregoing is true and correct to the best
16 of my knowledge. Executed this 1st day of August, 2008.

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18 _____
19 /s/ Sean F. O'Shea

20 Sean F. O'Shea
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26 _____
27 ¹ ConnectU, Cameron Winklevoss, Tyler Winklevoss, and Divya Narendra do not waive any arguments
28 or rights as to (i) the admissibility or inadmissibility of evidence surrounding the purported agreement, (ii)
the confidentiality or non-confidentiality of information relating to the purported agreement, or (iii) the
enforceability or unenforceability of the purported agreement.

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PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is **800 West Sixth Street, Suite 430, Los Angeles, California 90017.**

I have caused the service of **DECLARATION OF SEAN O'SHEA IN SUPPORT OF ADMINISTRATIVE MOTION TO SEAL UNREDACTED THIRD PARTY COMPLAINT** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notified the following:

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 1, 2008, at Los Angeles, California

/s/Mark A. Byrne