

EXHIBIT 22

1 Scott R. Mosko (State Bar No. 106070)
2 FINNEGAN, HENDERSON, FARABOW,
3 GARRETT & DUNNER, L.L.P.
4 Stanford Research Park
5 3300 Hillview Avenue
6 Palo Alto, California 94304
7 Telephone: (650) 849-6600
8 Facsimile: (650) 849-6666

9 Attorneys for Defendant PACIFIC
10 NORTHWEST SOFTWARE

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13 FACEBOOK, INC.

14 Plaintiff,

15 v.

16 CONNECTU LLC, (now known as CONNECTU
17 INC.) PACIFIC NORTHWEST SOFTWARE,
18 INC., WINSTON WILLIAMS, AND DOES 1-25,

19 Defendants.

CASE NO. C 07-01389 RS

**DEFENDANT PACIFIC NORTHWEST
SOFTWARE'S RESPONSE TO FIRST
SET OF INTERROGATORIES**

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1 **PROPOUNDING PARTY:** Plaintiff FACEBOOK, INC.
2 **RESPONDING PARTY:** Defendant PACIFIC NORTHWEST SOFTWARE
3 **SET NO.:** ONE (Nos. 1-4)
4

5 TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

6 Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendant, Pacific Northwest
7 Software ("PNS"), hereby responds and objects to the First Set of Interrogatories propounded by
8 Facebook Inc. ("FACEBOOK") as follows:

9 **GENERAL OBJECTIONS**

10 1. Responding party objects to each interrogatory and to the definitions and instructions
11 to the extent they seek to impose obligations that are broader than or inconsistent with the Federal
12 Rules of Civil Procedure, the Civil Local Rules, and the Court's Order allowing Expedited
13 Discovery.

14 2. Responding party objects to each interrogatory, and to the definitions and instructions
15 to the extent they seek the disclosure of information protected by the attorney-client privilege,
16 attorney work-product doctrine, or any other applicable privilege or protection, as provided by any
17 applicable law. Responding party does not intend to produce such privileged or protected
18 documents or information, and the inadvertent disclosure of such is not to be deemed a waiver of any
19 privilege. Responding party expressly reserves the right to object to the introduction at trial or any
20 other use of such information that may be inadvertently disclosed. In addition, Responding party
21 objects to the interrogatories and all definitions and instructions to the extent they seek and/or
22 require Responding party to produce a privilege log for documents or information falling within the
23 attorney-client privilege or work-product doctrine, if such documents or information were created
24 after the date that this lawsuit was filed.

25 3. Responding party objects to each interrogatory and all other definitions and
26 instructions to the extent they are vague, overly broad, unduly burdensome, exceed the boundaries of
27 discoverable information, or fail to describe the information sought with the required reasonable
28 particularity.

1 **RESPONSE TO INTERROGATORY NO. 2:**

2 Responding party objects to this Interrogatory as vague, over broad, compound and complex.
3 This interrogatory also seeks confidential and/or proprietary information. Responding party objects
4 to the phrase "California residents or businesses" as vague and uncertain and calling for a legal
5 conclusion and speculation. Subject to these objections and the general objections and the
6 objections to the definitions and instructions incorporated herein, Responding party answers as
7 follows: Responding party has generated approximately \$8,000,000 since its existence. Responding
8 party is informed and believes that its customer AST may be located in California, and has paid
9 Responding party \$103,656; that its customer Chadstar may be located in California, and has paid
10 Responding party \$47,437; that its customer Chula Vista Elementary School may be located in
11 California, and has paid Responding party \$64,449; that its customer City Ticket Exchange may be
12 located in California, and has paid Responding party \$37,000; that its customer ExamKrackers.com
13 may be located in California and has paid Responding party \$83,270; that its customer Know-the-
14 Course may be located in California and has paid Responding party \$30,500; that its customer
15 Michele Miller may be located in California and has paid Responding party \$3,375; that its customer
16 New Country Financial may be located in California and has paid Responding party \$12,150; that its
17 customer Nomad Cows may be located in California and has paid Responding party \$12,000; that its
18 customer Shapely Shadow, Inc. may be located in California and has paid Responding party \$1,440.

19 **INTERROGATORY NO. 3:**

20 IDENTIFY ALL Internet ("IP") Addresses and URLs that YOU used OR accessed to obtain
21 any data from any website associated with Facebook, Inc. (including but not limited to the
22 www.thefacebook.com and www.facebook.com), the purpose for the use or access, and ALL dates
23 in which such URLs or IP addresses were accessed by YOU.

24 **RESPONSE TO INTERROGATORY NO. 3:**

25 This interrogatory is unintelligible. It further assumes facts not in evidence. This
26 interrogatory is compound and complex and comprises at least three separate interrogatories. The
27 phrase "obtain any data from any website associated with Facebook, Inc." is vague and uncertain.
28 Subject to these objections and the general objections and the objections to the definitions and

1 instructions incorporated herein, Responding party answers as follows: Responding party has no
2 knowledge that will enable it to answer this interrogatory. Responding party believes Winston
3 Williams may have information regarding this interrogatory.

4 **INTERROGATORY NO. 4:**

5 IDENTIFY all instances (including dates) when YOU distributed email communications to
6 email addresses obtained originally from FACEBOOK, including identification of ALL email
7 addresses or PERSONS in California.

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9 **RESPONSE TO INTERROGATORY NO. 4:**

10 This interrogatory is unintelligible. It further assumes facts not in evidence. Subject to these
11 objections and the general objections and the objections to the definitions and instructions
12 incorporated herein, Responding party answers as follows: Responding party has no knowledge that
13 will enable it to answer this interrogatory. Responding party believes Winston Williams may have
14 information regarding this interrogatory.

15 As to Objections:

16 Dated: June 8, 2007

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

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19 By: 

Scott R. Mosko
Attorneys for Defendant
Pacific Northwest Software