

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

CONNECTU, INC., CAMERON	)	
WINKLEVOSS, TYLER WINKLEVOSS,	)	
AND DIVYA NARENDRA,	)	CIVIL ACTION NO. 1:07-CV-
	)	10593-DPW
Plaintiffs,	)	
	)	
v.	)	
	)	
FACEBOOK, INC., MARK ZUCKERBERG,	)	
EDUARDO SAVERIN, DUSTIN	)	
MOSKOVITZ, ANDREW MCCOLLUM,	)	
AND THEFACEBOOK LLC,	)	
	)	
Defendants.	)	
_____	)	

**DECLARATION OF DIVYA NARENDRA**

I, Divya Narendra, hereby declare as follows:

1. In late 2002, I conceived of an idea for a social networking site that catered to college and university students. I told two friends, Cameron and Tyler Winklevoss, about the idea, and the three of us ("the Founders") brainstormed ideas on how to make the idea into a viable business. We developed the plan of rolling out a website at Harvard, and if the website was successful, launching it at other colleges and universities.

2. Through the majority of 2003, we developed the website with the aid of two programmers: first, Sanjay Mavinkurve, a friend of mine, and, second, Victor Gao, another friend. While both individuals were highly intelligent and capable in their programming skills, each had other obligations that prevented them from fully committing to the Harvard Connection project.

3. Sometime in fall 2003, the Founders, as a group, decided that we needed a programmer who was as committed to the overall business as we were. To that end, we decided that the next programmer brought in should be made an equal member of the development team. As conceived by the Founders, this individual would receive equal financial benefit from the eventual website and would share in the development of the overall business.

4. In early November 2003, I contacted a friend and inquired whether he knew any capable programmers who might have time to help me with a website which I was developing. I did not give any details on the site itself, but I stated that I needed a programmer with substantial credentials. My friend suggested that I contact a fellow Harvard student named Mark Zuckerberg.

5. Shortly after I received this name from my friend, I passed on the contact information to Cameron Winklevoss. Cameron told me that he contacted Zuckerberg and set up a meeting with Victor Gao, Harvard Connection's then-current programmer.

6. In discussions between the Founders and Gao, we made clear that we would be willing to give Zuckerberg an equal share in the project if he were interested in such an option. We wished to align Zuckerberg's interests with ours, and believed the best way to do that was to make him an equal partner with the rest of the team.

7. I was informed that Zuckerberg joined the team after his meeting with Gao, and that the Winklevoss twins met with Zuckerberg about finishing the website shortly before Thanksgiving 2003. I did not physically meet Zuckerberg until a meeting in his dorm room in December 2003, but, up to that point, understood him to be a full member of the team.

8. The Founders met with Zuckerberg in his dorm room in late December 2003. At that meeting, the four of us discussed ideas for the site's development as well as what needed to be

done in order to complete the site by our proposed launch deadline, the end of 2003. Zuckerberg appeared enthusiastic at this meeting and continually referred to the team as "we" and suggested ideas on how "we" should develop the website.

9. At some point during the meeting, Zuckerberg and I discussed revenue streams for the Harvard Connection website. The Founders, as a group, stated that the original business plan should not be significantly modified at that meeting because our main goal was to get the site running, but we would be amenable to discussing changes in the plan post website launch. I did, however, tell Zuckerberg he would receive his fair share of any revenues the site generated. Zuckerberg agreed with this sentiment and did not dispute that his compensation would come from the website only once it became profitable. In discussing the financial potential for the website, Zuckerberg was visibly excited and enthusiastic about both the core concept and business model.

10. Our next meeting with Zuckerberg occurred in mid-January 2004. At this meeting, Zuckerberg was noticeably less enthusiastic about the enterprise and stated that he had many personal projects which required his time. When pressed about completing the Harvard Connection website, he told us that he would be able to do so, but only after completing these other projects. At no time did he tell us that he was working on a competing website or that he wished to end his partnership with us.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This Declaration is executed on the 20 day of September 2007.

/s/ Divya Narendra  
Divya Narendra