

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CONNECTU, INC., CAMERON
WINKLEVOSS, TYLER WINKLEVOSS,
AND DIVYA NARENDRA,

Plaintiff,

v.

FACEBOOK, INC., MARK ZUCKERBERG,
EDUARDO SAVERIN, DUSTIN
MOSKOVITZ, ANDREW MCCOLLUM, and
FACEBOOK, LLC,

Defendants.

Civil Action No. 1:07-CV-10593-DPW

**DECLARATION OF MICHAEL W. TRINH IN SUPPORT OF
RESPONSE TO ORDER TO SHOW CAUSE WHY THE MOTIONS TO SEAL (DKT.
NOS. 66, 69, 73, 80, 81, 82) SHOULD BE ALLOWED**

I, Michael W. Trinh, declare as follows:

1. I am an associate with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel for counsel for Defendants Facebook, Inc., Mark Zuckerberg, Dustin Moskovitz, Andrew McCollum, and TheFacebook, LLC (the "Facebook Defendants") in this action. I make this Declaration in support of the "Facebook Defendants' Response to September 5, 2007 Order to Show Cause Re: Motions to Seal." The matters contained in this declaration are of my own personal knowledge and, if called as a witness, I could and would testify competently to the matters set forth herein.

2. Attached hereto as Exhibit 1 is a true a correct copy of an email dated August 9, 2007 from Monte Cooper, Esq., counsel for the Facebook Defendants, to Meredith Schoenfeld, Esq., counsel for ConnectU, and others.

3. Attached hereto as Exhibit 2 is a true and correct copy of an email dated September 6, 2007 from John Hornick, Esq., counsel for ConnectU, to I. Neel Chatterjee, Esq., counsel for the Facebook Defendants, and others.

4. Attached hereto as Exhibit 3 is a true and correct copy of a letter dated September 20, 2007 from Bradley E. Abruzzi, Esq., associate attorney at the Office of the General Counsel at Harvard University, to Margaret A. Esquenet, Esq., counsel for ConnectU.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 21th day of September 2007, in Palo Alto, California.

/s/ Michael W. Trinh /s/

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