

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 MARK ZUCKERBERG 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, Mark Zuckerberg, declare as follows:

1. I am the Chief Executive Officer and founder of Facebook, Inc., the company which runs the online social network [www.facebook.com](http://www.facebook.com). I have been integrally involved in the development and operation of Facebook and its website applications from its beginning. I make this declaration in support of "Facebook Defendants' Response to September 5, 2007 Order to Show Cause Re: Motions to Seal." I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. Exhibit 37 of the Declaration of Meredith Schoenfeld in Support of ConnectU's First Amended Complaint (the Schoenfeld Declaration) contains computer source code developed by me. That source code includes password and authentication information that is not publicly known. Disclosure of any password and authentication information could compromise security of existing computer systems used by Facebook, Inc. and therefore harm Facebook, Inc.

3. Exhibit 40 of the Schoenfeld Declaration contains contact information of other members of my immediate family, as well as personal information such as telephone numbers. Because of the amount of public attention on this action (and its filings), I believe that disclosure of this information would invite harassment of my family as well as other intrusions to their privacy.

4. Exhibit 80 of the Schoenfeld Declaration is a private version of a journal that I wrote, related to a website known as "Facemash." This journal is not currently publicly available. This journal discusses, in a personally identifiable manner, third parties entirely unrelated to the subject matter of this action. This version also includes private, personal thoughts never intended for public disclosure. Disclosure of this document will intrude on privacy rights of those third parties and myself and cause embarrassment.

5. Exhibits 81<sup>1</sup> and 83 are copies of a private and personal email from myself to Eduardo Saverin sent on May 7, 2004 when I was still a student at Harvard University. I sent this email only to Mr. Saverin and never intended that this email be public ally distributed. Disclosure of that document may cause harm and intrude on personal privacy interests of both Mr. Saverin and myself. These exhibits also discuss pricing information which is sensitive business information.

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 20th day of September 2007, in Palo Alto, California.

/s/ Mark Zuckerberg

Mark Zuckerberg

OHS West:260305550.1

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<sup>1</sup> I understand that ConnectU has submitted two documents as Exhibit 81 on August 8 and 17, 2007. *See* Errata to Plaintiff's First Amended Complaint, Dkt. No. 75. I refer only to the "Exhibit 81" document submitted on August 8, 2007.