

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 OWEN VAN NATTA 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, Owen Van Natta, declare as follows:

1. I am Vice President of Operations & Chief Revenue Officer of Facebook, Inc. (“Facebook”). 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 56A of the Declaration of Meredith Schoenfeld in Support of ConnectU’s First Amended Complaint is an excerpt of a confidential report regarding Facebook, Inc. Paragraph 189 of the First Amended Complaint contains information directly derived from Exhibit 56A. Houlihan prepared the valuation report for Facebook after in-person meetings with Facebook’s senior management and review of highly confidential business discussions between Facebook and various third parties. Exhibit 56A discusses in detail the terms and conditions of those business discussions, including disclosure of existing investment and investors. Exhibit 56A also contains business analysis of the financial history and valuation information of Facebook. Because of the high level of detail in the report, the data in Exhibit 56A is among the most closely guarded confidential information to Facebook, and the entire report was marked “Confidential.” Disclosure of the information in Exhibit 56A would cause great competitive harm to Facebook and its investors.

3. Exhibit 63 of the Schoenfeld Declaration is a highly confidential Facebook document containing sensitive financial information of Facebook and its shareholders, including personal identifying information and highly specific financial information of each Facebook shareholder. Paragraphs 215 and 223 of the First Amended Complaint contain sensitive information directly derived from Exhibit 63. This investor information is extremely valuable and Facebook goes to great lengths to maintain the confidentiality and secrecy of its investor information (in any detail), such as the information found in Exhibit 63 and paragraphs 215 and

223. Release of this information would cause great competitive harm to Facebook and its shareholders.

4. Exhibit 67<sup>1</sup> of the Schoenfeld Declaration is a highly confidential Facebook document containing sensitive financial information of Facebook and its shareholders, including personal identifying information and highly specific financial information of each Facebook shareholder. Paragraphs 215 and 223 of the First Amended Complaint contain sensitive information directly derived from Exhibit 67. This investor information is extremely valuable and Facebook goes to great lengths to maintain the confidentiality and secrecy of its investor information (in any detail), such as the information found in Exhibit 67 and paragraphs 215 and 223. Release of this information would cause great competitive harm to Facebook and its shareholders.

5. Exhibit 78 of the Schoenfeld Declaration contains excerpts from a valuation report prepared for Facebook, Inc. Paragraph 268 of the First Amended Complaint quotes from Exhibit 78. Both Exhibit 78 and paragraph 268 contain extremely valuable discussion of Facebook's market, its competitors, and its business model. Release of this highly proprietary information would cause competitive harm to Facebook, Inc.

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/ Owen Van Natta

Owen Van Natta

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<sup>1</sup> ConnectU has submitted two similar documents as "Exhibit 67" on August 8 and 17, 2007. *See* Errata to Plaintiff's First Amended Complaint, Dkt. No. 75. I refer to both documents.