

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

**ASSENTED-MOTION TO SEAL THE MEMORANDUM IN SUPPORT OF THE
FACEBOOK DEFENDANTS' MOTION TO COMPEL PLAINTIFFS TO IMAGE AND
SEARCH THEIR MEMORY DEVICES FOR SOURCE CODE, AND TO COMPLY
WITH REQUESTS FOR PRODUCTION NOS. 1-2, 67-68 AND 117 AND EXHIBITS 3-4
AND 20-22 TO THE DECLARATION OF MONTE M. F. COOPER IN
SUPPORT THEREOF**

Defendants Facebook, Inc., Mark Zuckerberg, Dustin Moskovitz, Andrew McCollum, and TheFacebook, LLC (collectively, the "Facebook Defendants") hereby move to file under seal pursuant to the Stipulated Protective Order entered between the parties in the previous related case, *ConnectU v. Zuckerberg et al.*, Case No. 1:04-cv-11923-DPW, the following documents and exhibit:

1. **MEMORANDUM IN SUPPORT OF THE FACEBOOK DEFENDANTS' MOTION TO COMPEL PLAINTIFFS TO IMAGE AND SEARCH THEIR MEMORY DEVICES FOR SOURCE CODE, AND TO COMPLY WITH REQUESTS FOR PRODUCTION NOS. 1-2, 67-68 AND 117; AND**
2. **EXHIBITS 3-4 AND 20-22 TO THE DECLARATION OF MONTE M. F. COOPER IN SUPPORT OF DEFENDANTS' MOTION TO COMPEL PLAINTIFFS TO IMAGE AND SEARCH THEIR MEMORY DEVICES FOR SOURCE CODE, AND TO COMPLY WITH REQUESTS FOR PRODUCTION NOS. 1-2, 67-68 AND 117.**

This motion is necessary to comply with the provisions of the Stipulated Protective Order.

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

Counsel for Defendants certifies that pursuant to Local Rule 7.1, the parties have conferred regarding the motions to seal, and counsel for the Plaintiffs ConnectU, Cameron Winklevoss, Tyler Winklevoss, and Divya Narendara and Eduardo Saverin consent to the motion.

///

Dated: October 24, 2007.

Respectfully submitted,

/s/ Theresa A. Sutton /s/

G. Hopkins Guy, III*

I. Neel Chatterjee*

Monte Cooper*

Theresa A. Sutton*

ORRICK, HERRINGTON & SUTCLIFFE LLP

1000 Marsh Road

Menlo Park, California 94025

Telephone: (650) 614-7400

Facsimile: (650) 614-7401

hopguy@orrick.com

nchatterjee@orrick.com

mcooper@orrick.com

tsutton@orrick.com

Steven M. Bauer

Jeremy P. Oczek

PROSKAUER ROSE, LLP

One International Plaza, 14th Floor

Boston, MA 02110-2600

Telephone: (617) 526-9600

Facsimile: (617) 526-9899

sbauer@proskauer.com

joczek@proskauer.com

* Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on October 24, 2007.

Dated: October 24, 2007.

Respectfully submitted,

/s/ Theresa A. Sutton /s/

Theresa A. Sutton