

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-TO MOTION TO SEAL EXHIBITS 31 AND 34 TO THE DECLARATION
OF THERESA A. SUTTON IN SUPPORT OF FACEBOOK DEFENDANTS' REPLY TO
OPPOSITION TO MOTION TO COMPEL PLAINTIFFS TO IMAGE AND SEARCH
THEIR MEMORY DEVICES FOR SOURCE CODE, AND TO COMPLY WITH
REQUESTS FOR PRODUCTION NOS 1-2, 67-78, AND 117**

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 exhibits:

1. Exhibit 31 contains excerpts from the deposition of Winston Williams, which was taken on June 19, 2007, in *Facebook, Inc., et al. v. ConnectU Inc, et al.*, U.S.D.C., Northern District of California, Case No. 1:07-cv-01389. Plaintiffs’ counsel has designated this transcript as confidential pursuant to the Protective Order entered in that matter.
2. Exhibit 34 is a copy of an email chain from Cameron Winklevoss to Howard Winklevoss dated May 3, 2004, identified as C003865-C003869. Plaintiffs’ counsel has designated this email as confidential pursuant to the Protective Order entered in that matter.

Facebook Defendants asked Plaintiffs’ counsel (both in this action and the California action) to de-designate these exhibits, but at the time of this filing they had not responded to those requests. This motion, therefore, is necessary to comply with the provisions of the Stipulated Protective Order.

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

Counsel for Facebook Defendants certifies that pursuant to Local Rule 7.1, the parties have conferred regarding motions to seal, and counsel for the Plaintiffs consent to such motions.

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Dated: November 14, 2007

Respectfully submitted,

/s/ Theresa A. Sutton /s/

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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 November 14, 2007.

Dated: November 14, 2007.

Respectfully submitted,

/s/ Theresa A. Sutton /s/

Theresa A. Sutton