

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CONNECTU, INC.,

Plaintiff,

v.

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

Defendants.

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

Related Action No. 1:04-CV-11923-DPW

DEFENDANT EDUARDO SAVERIN'S STATUS REPORT REGARDING DISCOVERY

At the hearing on October 17, 2007, the Court inquired regarding the status of the document production obligations of Defendant Eduardo Saverin ("Saverin"). The scope of Saverin's outstanding production obligations was discussed and defined in a June 20, 2007 meet and confer between counsel for Saverin and ConnectU and a confirming June 23 email regarding that meet and confer. Saverin has recently produced documents bates-numbered FACE004686 – FACE016145, and FACE017567 – FACE018536. That production represents all non-privileged documents in Saverin's possession, custody, or control consistent with Saverin's obligations as defined by the meet and confer process.

Subsequent to the meet and confer, ConnectU raised one additional issue regarding code that might be located on Saverin's computer as a result of its use by someone other than himself. To address that issue, on November 15, 2007, Saverin also offered to subject images of the two relevant hard drives in his possession to a search pursuant to the protocol entered by the Court for Plaintiff to search memory devices for the Facebook Defendants. Plaintiff has agreed to that proposal, and the parties are in the process of negotiating appropriate modifications to the

protocol to make it applicable to Saverin's drives. Saverin's agreement to subject those images to the protocol will not change with regard to his status as a party or non-party in this case, and fully satisfies his outstanding document production obligations.

DATED: November 29, 2007

/s Daniel K. Hampton

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CERTIFICATE OF SERVICE

I hereby certify that this document 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 29, 2007.

/s Daniel K. Hampton
Daniel K. Hampton

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