

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CONNECTU, INC., CAMERON WINKLEVOSS,
TYLER WINKLEVOSS, AND DIVYA
NARENDRA,

Plaintiffs,

v.

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

Defendants.

CIVIL ACTION NO. 1:07-CV-10593-
DPW

**ERRATA RE: FACEBOOK’S MOTION FOR LIMITED RELIEF FROM STAY AND
TO ENJOIN PLAINTIFFS AND THEIR COUNSEL**

1. Defendant Facebook, Inc. submits this errata to clarify the following statement included in its recent Motion for Relief from Stay and to Enjoin Plaintiffs and their Counsel (Dkt. No. 291) filed on November 3, 2009.

Original Text	Corrected Text
Page 11, § B.1., “... Sean O’Shea, counsel for Plaintiffs in the arbitration, was present for the emergency motion hearing in Massachusetts ...”	... counsel for Facebook recalls that Sean O’Shea, counsel for Plaintiffs, was present for the emergency motion hearing in Massachusetts ...
Page 13, § B.2., “O’Shea was present at that hearing, as was at least one of the individual plaintiffs.”	At least one of the individual plaintiffs was present at that hearing, as was (Facebook believes) O’Shea.

2. This clarification is being made because Mr. O’Shea’s Partner, Michael Petrella, contends that Mr. O’Shea did not appear at the June 2, 2008, hearing. Facebook counsel believes that Mr. O’Shea attended but, given the claim by Mr. Petrella, can not be sure as the June 2, 2008 hearing was heavily attended by numerous persons on Plaintiffs’ behalf. In any event, the

O'Shea firm has a copy of the transcript from that hearing, apparently has confidential information submitted in the proceedings (although they appear to disclaim being counsel of record), has read such materials and cannot, therefore, claim they are unaware of what occurred at the June 2, 2008 hearing.

Dated: November 9, 2009

Respectfully submitted,

/s/ Monte M.F. Cooper /s/

I. Neel Chatterjee (admitted *pro hac vice*)
Monte M.F. Cooper (admitted *pro hac vice*)
Theresa A. Sutton (admitted *pro hac vice*)
ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
Menlo Park, CA 94025
Telephone: (650) 614-7400
Facsimile: (650) 614-7401

Steve 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

ATTORNEYS FOR FACEBOOK, INC.

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 9, 2009.

Dated: November 9, 2009.

/s/ Monte M.F. Cooper /s/

Monte M.F. Cooper