

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTSCONNECTU, INC., *et al.*,

Plaintiffs,

v.

FACEBOOK, INC., *et al.*,

Defendants.

CIVIL ACTION NO. 1:07-cv-10593-DPW  
(CONSOLIDATED WITH CIVIL ACTION  
NO. 1:04-cv-11923-DPW)**ASSENTED-TO MOTION TO ADMIT  
TYLER R. MEADE AND MICHAEL L. SCHRAG *PRO HAC VICE* ON BEHALF  
OF CAMERON WINKLEVOSS, TYLER WINKLEVOSS, AND DIVYA NARENDRA**

Pursuant to Local Rule 83.5.3(b) of the United States District Court for the District of Massachusetts, and with the assent of all parties, I, Arthur J. Guray, respectfully request that Attorneys Tyler R. Meade and Michael L. Schrag of Meade & Schrag LLP in Berkeley, California be permitted to appear *pro hac vice* and practice in this Court as counsel to Plaintiffs Cameron Winklevoss, Tyler Winklevoss and Divya Narendra (collectively, the “Founders”) in the above-captioned matter. In support of this motion, I state the following:

1. I am an associate attorney at the law firm of Sally & Fitch LLP, One Beacon Street, 16th Floor, Boston, Massachusetts 02108. I am a member in good standing of the bars of Massachusetts and of the United States District Court for the District of Massachusetts.

2. Sally & Fitch LLP entered an appearance in this action as local counsel for the Founders on October 8, 2009, after the Court entered its September 30, 2009 Order staying this Action (“Order to Stay”). Sally & Fitch was not previously involved in this litigation and is not involved in the related litigation pending in the Northern District of California and in the 9th Circuit Court of Appeals (collectively, the “California Litigation”). Sally & Fitch’s

representation of the Founders in this case has been limited to seeking limited relief from the Order to Stay.<sup>1</sup>

3. The Founders have engaged the law firm of Meade & Schrag and wish to have it serve as their lead counsel in this case at this time. Although this case is currently stayed, it is appropriate for Meade & Schrag to enter its appearance now because the Order to Stay requires the Parties to report to the Court within 10 days of any material developments in the California Litigation. Though certain Defendants filed with the Court on April 12, 2011 a Notice that the 9th Circuit Court of Appeals has issued a decision regarding the California Litigation (see Dkt. 332), there are additional matters that the Founders wish to bring to the attention of the Court. Given Sally & Fitch's limited role in this matter, Meade & Schrag should be admitted at this time so that it can file a status report on behalf of the Founders.

4. The Founders' other counsel who have appeared in this action have all withdrawn, are seeking to withdraw, or are the subject of motions to disqualify. Specifically, the law firm of Quinn Emanuel Urquhart Oliver & Hedges withdrew as counsel for the Founders on April 23, 2008. See Dkt. 186. Plaintiff ConnectU has moved to disqualify the law firms of Boies, Schiller & Flexner and Finnegan, Henderson, Farabow, Garrett & Dunner. See Dkt. 262.<sup>2</sup> Finnegan Henderson has also moved to withdraw. See Dkt. 324.<sup>3</sup>

5. As set forth in the accompanying Affidavits of Tyler M. Meade (Exhibit A hereto) and Michael L. Schrag (Exhibit B hereto), Attorneys Meade and Schrag are members of the bar

---

<sup>1</sup> The motions filed by Sally & Fitch on behalf of the Founders are under seal.

<sup>2</sup> All then-outstanding motions, including ConnectU's motion to disqualify Boies Schiller and Finnegan Henderson, were terminated without prejudice by the Order to Stay. However, a motion to disqualify Boies Schiller and Finnegan Henderson, filed in the California Litigation, was granted on September 2, 2009. See Dkt. 273 (reporting same to this Court).

<sup>3</sup> Finnegan Henderson's motion to withdraw, which was filed after the Order to Stay, is still pending before the Court.

in good standing in every jurisdiction in which they have been admitted to practice, there are no disciplinary proceedings pending against either of them in any jurisdiction, and both are familiar with the Local Rules of the United States District Court for the District of Massachusetts. Sally & Fitch will continue to act as local counsel for the Founders in this matter.

WHEREFORE, I, Arthur J. Guray, respectfully request that this Court ALLOW this motion and admit Tyler R. Meade and Michael L. Schrag *pro hac vice* as counsel for the Founders in the above-captioned matter.<sup>4</sup>

Dated: April 15, 2011

Respectfully submitted,

CAMERON WINKLEVOSS, TYLER  
WINKLEVOSS and DIVYA NARENDRA,

By their attorneys,

*/s/ Arthur J. Guray* \_\_\_\_\_

Peter E. Ball, BBO # 546031

*peb@sally-fitch.com*

Arthur J. Guray, BBO # 673540

*ajg@sally-fitch.com*

SALLY & FITCH LLP

One Beacon Street, 16th Floor

Boston, MA 02108

(617) 542-5542

(617) 542-1542 (fax)

---

<sup>4</sup> In the event that the Court concludes that the Order to Stay needs to be lifted before it can act on the instant motion, movant further requests that this Court lift the Order to stay for this limited purpose.

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)

I, Arthur J. Guray, hereby certify that counsel for the movants has conferred with counsel for all other Parties in this action regarding this motion, and all other Parties, through their counsel, have assented to this motion.

/s/ Arthur J. Guray

Arthur J. Guray

CERTIFICATE OF SERVICE

I, Arthur J. Guray, 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 or before April 19, 2011.

/s/ Arthur J. Guray

Arthur J. Guray