

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
McCULLUM, AND THEFACEBOOK LLC,

Defendants.

CIVIL ACTION NO. 1:07-cv-10593-DPW
(CONSOLIDATED WITH CIVIL ACTION
NO. 1:04-cv-11923-DPW)

**DECLARATION OF TYLER MEADE IN SUPPORT OF
CAMERON WINKLEVOSS, TYLER WINKLEVOSS AND DIVYA NARENDRA'S
MOTION FOR ACCESS TO PLEADINGS AND DISCOVERY FILES**

I, Tyler Meade, declare:

1. I am a member of the California State Bar who has been admitted *pro hac vice* in these consolidated cases as counsel of record for Cameron and Tyler Winklevoss and Divya Narendra ("the Founders"). I have personal knowledge of the matters stated herein and could and would competently testify thereto if called upon to do so.

2. Attached as Exhibit 1 is a true and correct copy of a June 22, 2011 letter that I received from Thomas B. Mason, outside counsel for the Finnegan firm.

3. Attached as Exhibit 2 is a true and correct copy of a June 21, 2011 letter that I sent to Mr. Mason. In this letter, I memorialized an earlier verbal request for certain information from his client's files.

4. Attached as Exhibit 3 is a true and correct copy of email correspondence from June 16, 2011 in which my partner and I requested that I. Neel Chatterjee and Alison Buchanan, counsel for the Facebook Defendants and ConnectU respectively, participate in a conference call to discuss the issues discussed in Exhibits 4 through 8 (described below). I did not receive a response to these requests.

5. Attached as Exhibit 4 is a true and correct copy of a June 13, 2011 letter that my office sent to Mr. Chatterjee, Ms. Buchanan and others. In this letter, my partner, Michael Schrag, sought to clarify certain facts and also to address some of the objections asserted by Mr.Chatterjee and Ms. Buchanan.

6. Attached as Exhibit 5 is a true and correct copy of a June 13, 2011 letter from Mr. Mason that is addressed to Ms. Buchanan. A copy of this letter was sent to me.

7. Attached as Exhibit 6 is a true and correct copy of an email that Mr. Chatterjee sent to my partner and me on June 10, 2011. I have not included the attachments to this email, which are lengthy.

8. Attached as Exhibit 7 is a true and correct copy of an email from Ms. Buchanan to my partner and me. Included in Exhibit 7 is an attachment containing (a) a copy of a letter that Ms. Buchanan apparently sent to the Founders' former counsel and (b) two enclosures apparently sent with that letter.

9. Attached hereto as Exhibit 8 is a true and correct copy of my firm's initial email correspondence with Mr. Chatterjee consisting of emails sent on June 2, 3 and 6, 2011. Included within Exhibit 8 is a copy of the Second Stipulated Protective Order, which was attached to my initial email to Mr. Chatterjee on June 2.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct to the best of my knowledge. Executed on July 1, 2011 in Berkeley, California.

/s/ Tyler Meade

Tyler Meade

CERTIFICATE OF SERVICE

I, Tyler Meade, 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 nonregistered participants on or before July 1, 2011.

/s/ Tyler Meade

Tyler Meade