

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)

**CAMERON WINKLEVOSS, TYLER WINKLEVOSS AND DIVYA NARENDRA'S
MOTION FOR SCHEDULING ORDER**

Cameron and Tyler Winklevoss and Divya Narendra (“the Founders”) move for a Scheduling Order so that post judgment proceedings can proceed in a fair, orderly and efficient manner. As discussed in the Founders’ recently filed Motion for Access to Pleadings and Discovery Files, the Founders intend to move under Federal Rule of Civil Procedure 60 for discovery and possibly further relief relating to instant messages that appeared in the press in 2010 that were never produced in this action. Specifically, the Founders request that the Court order that these post judgment motions proceed as follows:

1. The Founders shall file their motion for discovery under Rule 60(b) within 45 days of the date on which their new counsel, Meade & Schrag LLP, receives the complete pleadings and discovery files from prior counsel.

2. If the Court grants in part or in whole the Motion for Discovery, the Court will issue a further Scheduling Order setting the dates by which any discovery ordered must be completed and any further motions must be filed.

This motion is based on this Court's inherent power to control its docket. *Bangor v. Citizens Communications Co.*, 532 F.3d 70, 99 (1st Cir. 2008) ("A district court enjoys inherent power to 'control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants'") (citing, *Landis v. N. Am. Co.*, 299 U.S. 248, 254, (1936)).

Dated: July 15, 2011

Respectfully submitted,

CAMERON WINKLEVOSS, TYLER WINKLEVOSS and
DIVYA NARENDRA,

By their attorneys,

/s/ Michael Schrag

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

I, Michael Schrag, hereby certify that I have met and conferred with counsel for the other parties in this action and have attempted in good faith to resolve or narrow the issue presented herein.

/s/ Michael Schrag

Michael Schrag

CERTIFICATE OF SERVICE

I, Michael Schrag, 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 15, 2011.

/s/ Michael Schrag

Michael Schrag