

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 MICHAEL SCHRAG IN SUPPORT OF
CAMERON WINKLEVOSS, TYLER WINKLEVOSS AND DIVYA NARENDRA'S
MOTION TO PRESERVE INFORMATION NEEDED FOR RULE 60(b) MOTION**

I, Michael Schrag, 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 an August 5, 2011 (11:18 a.m.) email from Monte Cooper, counsel for Facebook, to various attorneys connected to this action.

3. Attached as Exhibit 2 is a true and correct copy of an August 5, 2011 (11:25 a.m.) email from Mr. Cooper to various attorneys connected to this action.

4. Attached as Exhibit 3 is a true and correct copy of an August 8, 2011 email (10:27 a.m.) from Tyler Meade, counsel for the Founders, to various attorneys connected to this action.

5. Attached as Exhibit 4 is a true and correct copy of an August 8, 2011 (10:52 a.m.) email from Mr. Meade to various attorneys connected to this action.

6. Attached as Exhibit 5 is a true and correct copy of an August 8, 2011 (3:22 p.m.) email from Mr. Cooper to various attorneys connected to this action.

7. Attached as Exhibit 6 is a true and correct copy of an August 8, 2011 (5:02 p.m.) email from Mr. Cooper to various attorneys connected to this action.

8. Attached as Exhibit 7 is a true and correct copy of an August 9, 2011 letter from Mr. Meade to Jeff Parmet, the Founders' computer forensic expert.

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 August 15, 2011 in Berkeley, California.

/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 August 15, 2011.

/s/ Michael Schrag
Michael Schrag