

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 DISCOVERY UNDER FED.R.CIV.P. 60(B)**

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 "At last -- The Full Story of How Facebook Was Founded," an article in *The Business Insider* dated March 5, 2010 that I accessed on April 15, 2011 at <http://www.businessinsider.com/how-facebook-was-founded-2010-3>.

3. Attached as Exhibit 2 is a true and correct copy of “The Face of Facebook,” an article in *The New Yorker* dated September 20, 2010 that I accessed on April 15, 2011 at http://www.newyorker.com/reporting/2010/09/20/100920fa_fact_vargas.

4. I am informed and believe that the document attached as Exhibit 3 is a true and correct copy of Defendants and Counterclaimants’ Responses to Plaintiff and Counterdefendants’ Request For Production of Documents, dated May 31, 2005.

5. Attached as Exhibit 4 is a true and correct copy of a letter dated November 23, 2005, from Robert D. Nagel to John F. Hornick.

6. Attached as Exhibit 5 is a true and correct copy of a letter dated January 7, 2006 from Robert D. Nagel to John F. Hornick.

7. Attached as Exhibit 6 is a true and correct copy of Facebook Defendants’ (i) Opposition To ConnectU LLC's Motion To Compel The Production of Mirror Images of Defendants’ Hard Drives And Other Electronic Memory Devices and Documents Created After May 21, 2004, and (ii) Cross-Motion For Protective Order, dated August 18, 2005.

8. Attached as Exhibit 7 is a true and correct copy of a letter dated February 6, 2006, from Robert D. Nagel to John F. Hornick.

9. Attached as Exhibit 8 is a true and correct copy of a letter dated February 15, 2006, from Robert D. Nagel to John F. Hornick.

10. Attached as Exhibit 9 is a true and correct copy of the transcript of Motion Hearing Before The Honorable Robert B. Collings United States Magistrate Judge Held On November 18, 2005.

11. Attached as Exhibit 10 is a true and correct copy of Facebook Defendants' Response To ConnectU's Renewed "Forensic Recovery" Arguments From The March 3, 2006 Motions Hearing.

12. Attached as Exhibit 11 is a true and correct copy of the pertinent pages from the March 1, 2006 hearing transcript.

13. Attached as Exhibit 12 is a true and correct copy of an email dated November 17, 2005, from Joshua Walker to Troy Grabow and John F. Hornick.

14. Attached as Exhibit 13 is a true and correct copy of a letter dated November 30 2005, from Robert D. Nagel to Troy Grabow.

15. Attached as Exhibit 14 is a true and correct copy of Facebook Defendants' Opposition To Plaintiff's Motion For Leave To File A Reply To Facebook Defendants' Response To ConnectU's "Forensic Recovery" Arguments, dated April 24, 2006.

16. I am informed and believe that the document attached as Exhibit 15 is a true and correct copy of the July 25, 2007 hearing transcript.

17. Attached as Exhibit 16 is a true and correct copy of the Joint Report Pursuant To Magistrate Judge Collings' June 12, 2007 Order, dated July 27, 2007.

18. Attached as Exhibit 17 is a true and correct copy of the Stipulated Order For Discovery Of Computer Memory Devices, dated July 2007.

19. Attached as Exhibit 18 is a true and correct copy of the Order For Discovery Of Computer Memory Devices, dated September 13, 2007.

20. I am informed and believe that the document attached as Exhibit 19 is a true and correct copy of the June 2, 2008 hearing transcript.

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 19, 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 August 19, 2011.

/s/ Tyler Meade
Tyler Meade