

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 LEAVE TO FILE MEMORANDUM EXCEEDING 20 PAGES**

Pursuant to Local Rule 7.1(b)(4), Plaintiffs Cameron Winklevoss, Tyler Winklevoss and Divya Narendra (collectively, the "Founders") respectfully request that the Court grant them leave to file a Memorandum in Support of Motion for Discovery under Fed. R. Civ. P. 60(b) (the "Memorandum") in excess of twenty pages.

The Memorandum supports the Founders' request for discovery pursuant to *Anderson v. Cryovac, Inc.*, 862 F.2d 910, 928-930 (1st Cir. 1988) to determine whether Facebook intentionally suppressed key evidence, including instant messages, during discovery, thereby entitling the Founders to relief under Rule 60(b). The Memorandum recounts years of factual and procedural history and includes numerous quotations from the litigation record, the allegedly *bona-fide* instant messages themselves, and media reports exposing the allegedly *bona-fide* instant messages. Though the history and quotations occupy much of the Memorandum, the Founders believe they will aid the Court in deciding the Motion for Discovery. Additionally, the

Memorandum describes the scope of the proposed discovery in detail so that the Court and other parties will understand the exact relief that the Founders request. The proposed Memorandum is twenty-four pages long.

WHEREFORE, for the foregoing reasons, the Founders respectfully request that Court ALLOW this motion and grant the Founders leave to file a Memorandum in excess of twenty pages.

Dated: August 19, 2011

Respectfully submitted,

CAMERON WINKLEVOSS, TYLER WINKLEVOSS and  
DIVYA NARENDRA,

By their attorneys,

/s/ Tyler Meade

Tyler Meade, Cal. State Bar No. 160838 (*Pro Hac Vice*)

*tyler@meadeschrag.com*

Michael Schrag, Cal. State Bar No. 185832 (*Pro Hac Vice*)

*michael@meadeschrag.com*

MEADE & SCHRAG, LLP

1816 Fifth Street

Berkeley, CA 94710

(510) 843-3670

(510) 843-3679 (fax)

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

I, Tyler Meade, hereby certify that counsel for the Founders have met and conferred with the Facebook Defendants and ConnectU in an attempt to resolve or narrow the issue presented herein.

/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