

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CONNECTU, INC., CAMERON
WINKLEVOSS, TYLER WINKLEVOSS, and
DIVYA NARENDRA,

Plaintiff,

v.

FACEBOOK, INC., MARK ZUCKERBERG,
EDUARDO SAVERIN, DUSTIN
MOSKOVITZ, ANDREW MCCOLLUM, and
FACEBOOK, LLC,

Defendants.

Civil Action No. 1:07-CV-10593-DPW

CONNECTU LLC,

The CU Founders,

v.

MARK ZUCKERBERG, EDUARDO
SAVERIN, DUSTIN MOSKOVITZ, ANDREW
MCCOLLUM, CHRISTOPHER HUGHES, and
FACEBOOK, INC.,

Defendants.

Civil Action No. 1:04-CV-11923 (DPW)

MARK ZUCKERBERG, and FACEBOOK,
INC.,

Counterclaimants,

v.

CONNECTU LLC, Counterdefendant, and
CAMERON WINKLEVOSS, TYLER
WINKLEVOSS, and DIVYA NARENDRA,
Additional Counterdefendants.

**ASSENTED-TO MOTION FOR LEAVE TO FILE CERTAIN DOCUMENTS
UNDER SEAL**

The Facebook Defendants hereby move for leave to file under seal the following documents:

1. **FACEBOOK DEFENDANTS' CONSOLIDATED OPPOSITION TO PLAINTIFFS' MOTION FOR DISCOVERY AND MOTION TO PRESERVE INFORMATION;**
2. **EXHIBITS 1-4 and 7 TO THE DECLARATION OF MONTE M.F. COOPER IN SUPPORT THEREOF.**

The Facebook Defendants respectfully seek leave to file these materials under seal because they contain information that has been designated by the parties as confidential under the Second Stipulated Protective Order, or that are similarly protected from disclosure under a Protective Order governing the use and disclosure of confidential information in *Facebook, Inc. v. ConnectU, LLC.*, Case No. 1:05-CV-047381 (attached hereto as **Exhibit A**). Attached hereto as **Exhibit B** is a true and correct copy of an Order Granting Motions to Seal in the Northern District of California, pursuant to which Exhibit 7 was filed under seal in that court. In accordance with the Local Rules, the Facebook Defendants respectfully request that their Consolidated Opposition and Exhibits 1-4 and 7 to the Declaration of Monte M.F. Cooper in support thereof be impounded until this litigation between the parties is dismissed, at which time they will be retrieved by counsel for Facebook.

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

Counsel for the Defendants certify that pursuant to Local Rule 7.1, the parties have conferred regarding this motion for leave to file under seal, and counsel for the Plaintiffs ConnectU, Cameron Winklevoss, Tyler Winklevoss, and Divya Narendara consent to the motion.

Dated: September 2, 2011

Respectfully submitted,

/s/ I. Neel Chatterjee /s/

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Eduardo Saverin, Facebook, Inc., and
Facebook LLC***

CERTIFICATE OF SERVICE

I hereby certify that this document(s) 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 non registered participants on September 2, 2011.

Dated: September 2, 2011

Respectfully submitted,

/s/ I. Neel Chatterjee /s/

I. Neel Chatterjee