

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

PAUL D. CEGLIA,

Plaintiffs,

-vs-

AFFIDAVIT

Docket No. 10-CV-569-RJA

MARK ELLIOT ZUCKERBERG
and FACEBOOK, INC.,

Defendants.

STATE OF NEW YORK)
COUNTY OF ERIE) SS.:
CITY OF BUFFALO)

TERRENCE M. CONNORS, ESQ. being duly sworn, deposes and says that:

1. I am an attorney at law admitted to practice before this Court and a partner in the law firm, CONNORS & VILARDO, LLP, attorneys who appeared for Plaintiff, PAUL D. CEGLIA, (hereinafter "Plaintiff"), in the above-captioned matter on July 16, 2010.

2. I make this affidavit in support of Plaintiff's Memorandum of Law in Opposition to Defendants' Motion to Dissolve Temporary Restraining Order.

3. Upon information and belief, Defendants have diminished, diluted, and alienated at least 76% of the ownership interest in Facebook through various transactions, including the following:

- Summer 2004 - Peter Thiel - \$500,000 loan, converted to 10.2% ownership in 2005.
- Summer 2004 - Mark Pincus - \$40,000 investment.
- Summer 2004 - Reid Hoffman - \$40,000 investment.

- Fall 2004 - Western Technology Investment - \$25,000 investment.
- April 2005 - Accel Partners - \$12.7 million investment for 15% ownership.
- April 2005 - Jim Breyer - \$1 million investment for 1% ownership.
- April 2006 - Greylock Partners - investment.
- April 2006 - Meritech Capital - investment.
- April 2006 - Peter Thiel, Accel Partners - further investment.
- June 2006 - Interpublic Group - investment for 0.5% ownership.
- Fall 2007 - Microsoft - \$240 million investment for 1.6% ownership.
- Fall 2007 - Li Ka-Shing - \$60 million investment for 0.4% ownership.
- May 2009 - Digital Sky Technologies - \$200 million investment for 2% ownership.

4. It is currently unknown whether these are the only transactions by which Defendants have diminished, diluted, or alienated ownership of Facebook.

5. The contract at issue entitles Plaintiff to 84% ownership interest in Facebook.

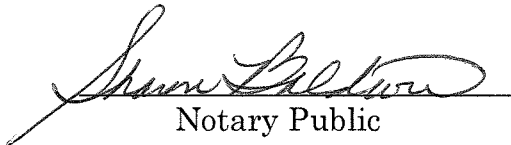
6. Accordingly, without some form of restraint in place to prevent the Defendants from diminishing, diluting, or otherwise alienating additional

ownership of Facebook, Plaintiff will be irreparably harmed for the reasons set forth in the accompanying memorandum of law.



Terrence M. Connors, Esq.
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Sworn to before me this
16th day of July, 2010



Notary Public

SHARON BALDWIN
Notary Public, State of New York
Qualified in Erie County
My Commission Expires Nov. 30, 2010