

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

PAUL D. CEGLIA,

Plaintiff,

v.

MARK ELLIOT ZUCKERBERG, Individually, and
FACEBOOK, INC.

Defendants.

Civil Action No. : 1:10-cv-00569-RJA

**NOTICE OF MOTION FOR
ORDER PROHIBITING
DEFENDANTS FROM
RELIANCE ON ARGUMENT
THAT EMAIL EXCHANGES
BETWEEN CEGLIA AND
ZUCKERBERG ARE FRAUDS**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, Mr. Ceglia will move this Court, at a date and time to be set by the Court, for an order:

1. Prohibiting Defendants from reliance on any argument in any dispositive motion filed before or at the end of Expedited Discovery that email exchanges between Ceglia and Zuckerberg referenced in any complaint are frauds.
2. Permitting Ceglia to retain his own computer forensics expert to fully examine the complete email record of Defendant Zuckerberg including records sealed in other lawsuits in which Defendant Zuckerberg or Facebook, Inc. was or is a party.

Pursuant to Local Civil Rule of Procedure 7 of this Court, Plaintiff requests an oral argument and states his intention to file and serve a reply to Defendants' response to this motion.

Respectfully submitted,

/s/Dean Boland

Paul A. Argentieri
188 Main Street
Hornell, NY 14843
607-324-3232 phone
607-324-6188
paul.argentieri@gmail.com

Dean Boland
18123 Sloane Avenue
Lakewood, Ohio 44107
216-236-8080 phone
866-455-1267 fax
dean@bolandlegal.com