

# EXHIBIT A

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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PAUL D. CEGLIA,

Plaintiff,

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

v.

MARK ELLIOT ZUCKERBERG, Individually,  
and FACEBOOK, INC.

Defendants.

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REQUEST FOR PRODUCTION OF  
DOCUMENTS TO DEFENDANT  
ZUCKERBERG

Pursuant to Rule 33 of the Federal Rules of Civil Procedure and this Court's orders, Plaintiff Paul Ceglia propound the following request for production of documents to Defendant Zuckerberg whom shall respond to these interrogatories separately and fully, in writing and under oath, with the responses reasonably amended as required by law.

**INSTRUCTIONS AND DEFINITIONS**

1. The following apply to all interrogatories

- a. The terms "any," "all," "each," and "every" should be understood to be either their most inclusive or least inclusive sense as necessary to bring within the scope of any interrogatory, all information otherwise construed to be outside of its scope.
- b. The terms "and" and "or" are to be construed disjunctively or conjunctively as necessary to include all information that might otherwise be considered outside of the scope of these interrogatories
- c. The use of the singular and plural are interchangeable.

- d. If an answer is based on information and belief, specify and identify the source of the information and the grounds for the belief.
- e. You must provide all requested information, not subject to a valid objection, that is known to, possessed by or available to you,
- f. If you are unable to answer any of the interrogatories, you must answer as fully as possible and explain your inability to answer the remainder.
- g. If you object to any interrogatory on the basis of attorney/client or work product privilege, identify the privilege claimed as well as each statement or communication for which such privilege is claimed, together with the following information for each such statement or communication: (a) the date made; (b) the persons present; (c) the subject matter; and (d) the basis on which the privilege is claimed.

## **DEFINITIONS**

1. “You” and “Your” refers to Defendant Zuckerberg and any of your agents or independent contractors.
2. Facebook Contract or “the contract” or “the contract between the parties” refers to the two page paper document presented to Defendants’ experts in July 2011 for evaluation and examination at the offices of Harris Beach in Buffalo, New York.
3. References to “Facebook” include “thefacebook, Inc.” and vice versa.
4. “Person” refers to any natural person or any business, legal or governmental entity or association in any form.
5. “Plaintiff” refers to Paul D. Ceglia.

6. “Defendants” refers to any of the following parties as well as their employees, agents, independent contractors or affiliated entities: Mark Elliot Zuckerberg and Facebook.

## **REQUEST FOR PRODUCTION OF DOCUMENTS**

### **REQUEST NO. 1**

All documents executed by you or any representative or agent for you involving the purported to transfer any software, programming language, business interests or other intellectual property into Facebook before, during and after its incorporation in July 2004.

### **REQUEST NO. 2**

All documents reflecting Facebook’s your claimed ownership rights in the software, programming language and business interests in the business **before** the incorporation of Facebook.

### **REQUEST NO. 3**

All agreements executed by you and any other person(s) or entities who claimed ownership in the business before the incorporation of Facebook in 2004.

### **REQUEST NO. 4**

All documents reflecting your ownership rights in the software, programming language and business interests in the business **after** the incorporation of Facebook.

### **REQUEST NO. 5**

All documents supporting your claimed breach of the Facebook Contract with Plaintiff.

### **REQUEST NO. 6**

All documents executed by you in connection with the incorporation of Facebook in July  
2004.

Paul A. Argentieri  
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Respectfully submitted,

/s/Dean Boland

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