

EXHIBIT B

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

PAUL D. CEGLIA,

Plaintiff,

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

v.

MARK ELLIOT ZUCKERBERG, Individually,
and FACEBOOK, INC.

Defendants.

REQUEST FOR PRODUCTION OF
DOCUMENTS TO DEFENDANT
FACEBOOK

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 Facebook 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 Facebook 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 Facebook or any representative or agent for Facebook 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 ownership rights in the software, programming language and business interests in the business just before the incorporation of Facebook.

REQUEST NO. 3

All agreements executed by Facebook 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 the ownership rights in the software, programming language and business interests in the business just after the incorporation of Facebook.

REQUEST NO. 5

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

REQUESTS NO. 6

All documents executed by any persons involved with the incorporation of Facebook in July 2004 who claimed ownership of any percentage of the software, programming or business interests of the business being incorporated.

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
1475 Warren Road
Unit 770724
Lakewood, Ohio 44107
216-236-8080 phone
866-455-1267 fax
dean@bolandlegal.com