Ceglia v. Zuckerberg et al

THE FACEBOOK VS. CONNECTU

## MARK ZUCKERBERG

**APRIL 25, 2006** 

Doc. 623 Att. 3

**THE WITNESS** is Mark Zuckerberg; MR. GUY is an attorney for Facebook; MR. MOSKO is an attorney for ConnectU; *Endnotes*: Sources.]

71 75 1 Q. Yes. 1 A. No. 2 A. I don't think so. I mean I may – like 2 Q. Did you share your idea with anyone about 3 3 reporters from the newspaper may have asked me. I The Facebook in 2003 when you apparently had? don't know if you count that but not like the 4 MR. GUY: Objection, vague and ambiguous. 5 administration. 5 THE WITNESS: I don't remember and I also 6 Q. No. I'm talking about somebody with the 6 never said that I had the idea in 2003. Really, 7 administration? 7 unsure of like when the moment was that it 8 A. That's what I figured but I just wanted to 8 crystallized and I said I'm going to make Facebook. 9 9 BY MR. MOSKO: make sure. 10 Q. All right. Whenever that was did you 10 Q. Is it your understanding that you can return to Harvard at any future time? share your ideas with anyone? 11 11 MR. GUY: Again, vague and ambiguous. 12 12 13 THE WITNESS: I must have eventually told 13 Q. And that would be without having to apply to Harvard to get reinstated? 14 Eduardo, right? 14 BY MR. MOSKO: 15 A. That's my understanding. 15 16 MR. GUY: Objection, vague. Answer if you 16 Q. When you initially had the idea whenever 17 can. 17 it was, did you tell Eduardo both idea? 18 THE WINTESS: It's my understanding that 18 MR. GUY: Still vague and ambiguous, calls 19 you can take indefinite leaves at Harvard and then 19 for speculation. Answer if you can. return whenever you like. 20 THE WITNESS: By initially, do you mean BY MR. MOSKO. 21 like within seconds or like within what period of 21 Q. Now, physically, what state were you in time or – I'm just like not sure I understand. 22 22 when you conceived of the idea for TheFacebook? 23 BY MR. MOSKO: 23 A. When like the original idea came to me? 24 Q. Can you tell me how much time passed 24 25 between when you initially had the idea and when you 25 Q. Yes 74 76 told Eduardo? 1 A. I don't know. I was probably at Harvard. 1 2 Q. Well, if you began writing code for it 2 MR. GUY: Again, assumes facts, calls for sometime in January, did you have the original idea 3 speculation. Answer if you can. for TheFacebook sometime in the fall – sometime in 4 THE WITNESS: No. Instead of making – 4 5 2003? 5 you're asking me question not very useful. 6 6 A. I don't know. I mean it was like a lot of BY MR. MOSKO: 7 the stuff in Facebook was combined from Course Match 7 Q. Was Eduardo the first person you told 8 and thing likes that that was written in 2003. 8 about your idea that eventually became TheFacebook? 9 Q. Okay, and did your – did the idea that 9 MR. GUY: Objection, assumes facts. Answer 10 you originally had with respect to TheFacebook, did 10 if you can. it change in any way to the point, up until the 11 THE WITNESS: I'm not sure if he was 11 point in time when it launched on February 4th? 12 absolutely the first but he was one of the people I 12 13 A. Sorry. I don't understand. 13 told early on about it. 14 Q. Well, you have the idea of Facebook at BY MR. MOSKO: 14 sometime perhaps 2003; is that right? 15 Q. Who early on did you tell about your ideas 15 A. Maybe, yeah. that eventually became thefacebook.com? 16 16 Q. And was there a difference between the A. I don't know everyone. I assume I 17 17 initial idea and the form in which it took when it 18 discussed it with people who I typically discuss 18 19 launched in 2004, February 2004? 19 things that I was making. A. Yeah. Of course. 20 Q. As you sit here today tell me who you

(650) 324-1181

25 they are?

Q. What changes occurred between the initial

Q. As you sit here today can you tell me what

idea and the launch in 2004?

A. Probably a lot of little ones.

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23 24 21

22 23

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25

you can.

recall discussing the ideas that eventually became

MR. GUY: Calls for speculation. Answer if

THE WITNESS: I really like don't remember

TheFacebook, "early on," to use your phrase?