

# EXHIBIT A

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

PAUL D. CEGLIA, )

)

Plaintiff, )

)

vs. )

No. 1:10-cv-00569

)

(RJA)

MARK ELLIOT ZUCKERBERG, )

Individually, and )

FACEBOOK, INC., )

)

Defendants. )

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July 25, 2012

10:14 a.m.

Deposition of JAMES A. BLANCO, held at  
the offices of Gibson, Dunn & Crutcher LLP,  
200 Park Avenue, New York, New York, pursuant  
to court order, before Laurie A. Collins, a  
Registered Professional Reporter and Notary  
Public of the State of New York.

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A P P E A R A N C E S :

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MATTHEW BENJAMIN, ESQ.  
AMANDA AYCOCK, ESQ.

ALSO PRESENT :

CODY DETWEILER  
JERRY LaPORTE  
GUS LESNEVICH  
PETER TYTELL  
DMITRY ZVONKOV, Videographer



1 Blanco

2 Q. Do you think that Mr. Tytell is lying?

3 A. No, no. But it's a judgment call what  
4 he's looking at. So he -- when he --

5 Q. But my question is do you think he's  
6 lying. You answered that.

7 MR. BOLAND: Objection. You're  
8 interrupting his question -- response.

9 MR. SOUTHWELL: No, his response.

10 MR. BOLAND: You have done that several  
11 times now, Alex.

12 A. I don't think he's lying, but to finish  
13 my answer --

14 Q. My question is do you think he's lying  
15 or not.

16 A. I think you rolled out of another  
17 question. Can we read it back, go back a couple?

18 Q. I'll read it to you. I'll ask the  
19 court reporter to read it to you at line 121.

20 (Discussion off the record.)

21 (Record read as follows: Right. And  
22 that could have led -- well, for whatever  
23 reasons, there could have been faded ink on  
24 the morning of July 14th, as Mr. Tytell put in  
25 his declaration; correct?)





1 Blanco

2 correct?

3 A. That was their allegation.

4 Q. And you recited some language out of  
5 the settlement agreement, including the  
6 integration clause, and cited us to Black's Law  
7 Dictionary for the integration of that clause.

8 A. Yes.

9 Q. You're aware, however, the academy has  
10 made it clear that no money was paid to anyone in  
11 the settlement and that the ethics committee's  
12 findings were not overturned or vacated; right?

13 A. That's the part where I said no earlier  
14 when you asked me about that. That is not -- that  
15 is -- that's what they claim, but it's not  
16 correct, because I think you asked me is it  
17 correct.

18 Q. Right.

19 A. No, that's not correct. They're wrong.  
20 In fact, you have the same Joe Bono there who  
21 signed the investment agreement repudiating the  
22 contract he signed. He has a JD degree. It's  
23 ridiculous.

24 Q. So you understand that his position is  
25 that the ethics committee findings were not



