

IN THE UNITED STATES DISTRICT COURT**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**CROSS ATLANTIC CAPITAL PARTNERS, INC., **CIVIL ACTION**

Plaintiff,

NO. 07-CV- 02768-JP

v.

FACEBOOK, INC. and THEFACEBOOK, LLC,

JURY TRIAL DEMANDED

Defendants.

FACEBOOK'S NOTICE AND MOTION FOR PROTECTIVE ORDER

COME NOW defendants Facebook, Inc. and Thefacebook, LLC (collectively "Facebook") by and through undersigned counsel, and hereby move for a protective order prohibiting the deposition of Mark Zuckerberg, Facebook's founder, CEO and Chairman of the Board.

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, this Court is authorized and empowered, for good cause shown, to enter an order which justice requires to protect a person from annoyance, embarrassment, oppression, or undue burden or expense. Fed. R. Civ. P. 26(c).

The grounds for this motion are set forth in the accompanying memorandum, declarations, and attached exhibits, which are incorporated by reference as if fully set forth herein. Defendant Facebook has shown good cause as to why plaintiff XACP is not entitled to the deposition of Mark Zuckerberg.

CERTIFICATE OF SERVICE

This is to hereby certify that on March 4, 2008, I caused a true and correct copy of FACEBOOK'S NOTICE AND MOTION FOR PROTECTIVE ORDER to be served via this Court's Electronic Filing ("ECF") System, upon the following:

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_____/s/ Heidi L. Keefe
Heidi L. Keefe