



4. To date, several class action lawsuits have been filed, mostly in the Southern District of New York (None in this District). The Petitioner does not intend to join in any of them and hereby opts out if such decision is important herein. Almost all are based upon newspaper accounts and reports from Reuters, the Motley Fool and others, detailing alleged serious improprieties in the days leading up to the IPO. If true, the allegations are a clear basis for claims of serious security laws violations.
5. The problem with the reports is that they are that just that, reports and not facts. The Petitioner desires to conduct actual formal discovery through oral depositions and requests for documents to determine the following facts:
  - a. Did Facebook indeed report any negative information to the underwriters during the IPO's road show which was material to an investment decision, but which did not make its way into required public documents.
  - b. Did any of the underwriters disclose this information to just some, but not the whole investing public.
  - c. Did any of the Respondents take any action to artificially increase the price of the offering before the shares were made available to the public, in order to personally benefit before the truth came out.
  - d. Other than to "make history" as the highest IPO ever, why was the IPO priced at \$38.00 given the alleged road show disclosures.

- e. The identity of the persons responsible for any of the above enumerated actions at Facebook and at the various underwriters.
6. The Petitioner attaches hereto a sampling of the class action complaints filed to date as **Exhibits A and B**.
7. The Petitioner seeks to depose the following persons or designated representatives of the corporate Respondents with the most knowledge on the matters designated above, to wit:
  - a. Mark Zuckerberg (“Zuckerberg”) who has served as Facebook’s Chief Executive Officer (“CEO”) and a member of the Facebook boards since July 2004 and has been Chairman of the board since January 2012. Zuckerberg signed the registration statement for the IPO, filed with the SEC on May 16, 2012 (the “Registration Statement”). Zuckerberg was also a selling shareholder on the IPO selling 125,995,713 shares on the IPO.
  - b. David A. Ebersman (“Ebersman”) who has served as Facebook’s Chief Financial Officer (“Officer”) since September 2009. Ebersman signed the Registration Statement.
  - c. David M. Spillane (“Spillane”) who has served as Facebook’s Chief Accounting Officer since prior to the IPO. Spillane signed the Registration Statement.
  - d. Designated representative(s) of Morgan Stanley & Co., LLC (“Morgan Stanley”) who was a co-lead underwriter for the IPO and also served as representative of all of the other underwriters of the IPO.

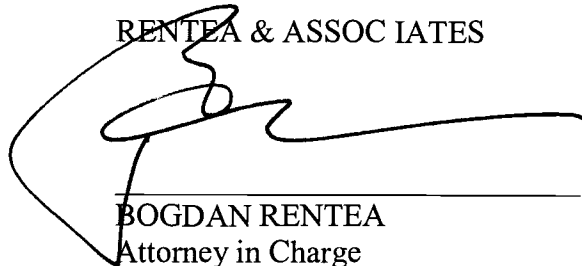
- e. Designated representative(s) of J.P. Morgan Securities, LLC (“J.P. Morgan”) who was a co-lead underwriter for the IPO.
- f. Designated representative(s) of Goldman Sachs & Co. (“Goldman Sachs”) who was a co-lead underwriter for the IPO.

All Respondents do business and are otherwise found in this District and specifically Travis County, Texas.

- 8. The Petitioner requests that the Court, after notice and hearing, issue an order allowing for the requested discovery to take place.
- 9. The Petitioner request that he be granted such other and further relief to which he may show himself justly entitled.

Respectfully Submitted,

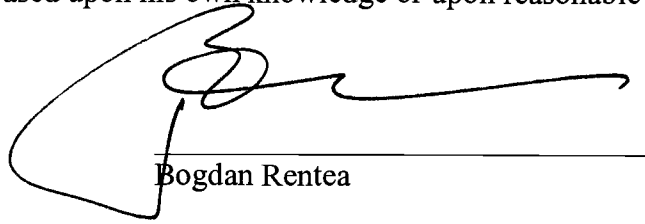
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**VERIFICATION**

The undersigned, under penalty of perjury, hereby states that all factual matters stated herein are true and correct and either based upon his own knowledge or upon reasonable and diligent investigation.



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Bogdan Rentea