

## **EXHIBIT D**

**Exhibit D: Class Definitions in  
Eleven Pending "Referrer Header" Cases Against Facebook and Zynga in Federal Court<sup>1</sup>**

Case Name	Class Definitions
In re: Facebook Privacy Litigation	All Facebook users in the United States who, at any time after May 28, 2006 clicked on a third-party advertisement displayed on Facebook.com.
Marfeo	Class I: All Facebook users, who reside in the United States, who interacted with Facebook's authorized Applications on Facebook's social networking website, and, as a result of such interactions had their user's ID transmitted to third-party advertisers and/or internet tracking companies. Class II: All Facebook users, who reside in the United States, whose user ID was embedded in the URL Referrer Header, and who clicked on a third-party advertisement displayed on Facebook's social networking website, anytime on or before May 21, 2010.
Graf	All registered users of Facebook.com in the United States who, at any time after October 18, 2006 registered a profile with Zynga.
Albini	All Facebook users in the United States who, at any time after October 18, 2006 utilized a Facebook application, including but not limited to Farmville, manufactured by Zynga.
Gudac, Belies	All users of Zynga's Facebook applications from the time of Zynga's founding through the present day.
Schreiber	All persons in the United States who registered with Zynga while on the Facebook web site.
Swanson	All persons in the United States who are registered users of Facebook.com and who registered a profile with Zynga Game Network, Inc. from June 2007 through the present.
Phee, O'Hara	All Facebook users who reside in the United States and who, at any time after October 18, 2006, (i) interacted with Facebook's authorized applications or (ii) who, at any time after October 18, 2006, clicked on a third-party advertisement displayed on Facebook's social networking website.
Bryant, Brock	The Facebook Class: All United States Facebook users who have clicked on a third-party advertisement on Facebook's website. The Zynga Class: All persons in the United States who have clicked on a third-party advertisement while accessing a Zynga application through the Facebook website.
Moskowitz	All registered Facebook members in the United States who utilized Facebook Platform Applications.
Scherek	All Facebook users who, from October 28, 2006 through the present, who had personally identifying information, including but not limited to their unique Facebook user identification number, transferred by Facebook, Zynga, or any other Facebook Developers to any advertiser, ad network, ad exchange, data broker, or other advertising related toolset.

<sup>1</sup> *Carmel-Jessup v. Facebook & Zynga*, No. 10-cv-04930-JW, another "Referrer Header" case, was voluntarily dismissed on November 22, 2010.