

# EXHIBIT I

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17 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

18 **COUNTY OF LOS ANGELES**

19 DAVID A. COHEN, a minor, by and through  
20 ROBIN S. COHEN as Guardian *ad Litem*;  
SHELBY A. ORLAND, a minor, by and  
21 through MARCIA J. ORLAND as Guardian *ad*  
*Litem*; for all others similarly situated,

22 Plaintiffs,

23 v.

24 FACEBOOK, INC., a Delaware corporation,  
25 and DOES 1 through 100, inclusive,

26 Defendants.

Case No. BC444482

Consolidated with No. BC454799

Complaint filed August 26, 2010

**DECLARATION OF ANTONY STUART  
IN SUPPORT OF PLAINTIFFS'  
REQUEST FOR VOLUNTARY  
DISMISSAL WITHOUT PREJUDICE**

Hon. Debre Katz Weintraub

27 **AND ALL CONSOLIDATED CASES**

1 I, Antony Stuart, declare as follows:

2 1. I am an attorney duly licensed to practice law in all courts of the State of  
3 California. I am the principal of Stuart Law Firm, co-counsel for Plaintiffs in this action. I have  
4 personal knowledge of the matters set forth herein, and if called as a witness, I could and would  
5 testify competently upon them.

6 2. Plaintiffs David A. Cohen, a minor, by and through Robin S. Cohen as Guardian  
7 ad Litem, and Shelby A. Orland, a minor, by and through Marcia J. Orland as Guardian ad Litem  
8 filed their complaint against Defendant Facebook, Inc. ("Defendant" or "Facebook") on August  
9 26, 2010 ("*Cohen* Action").

10 3. On February 9, 2011, Plaintiff Juliet Meth, a minor, by and through Robert Meth  
11 as Guardian ad Litem filed a related action ("*Meth* Action").

12 4. The Court consolidated the *Cohen* Action, Case No. BC444582, and the *Meth*  
13 Action, Case No. BC454799, under Case No. BC444582 on June 28, 2011. The Plaintiffs filed a  
14 First Master Class Action Complaint for the consolidated action on July 5, 2011.

15 5. On August 4, 2011, Facebook filed a Demurrer to Plaintiffs' First Master Class  
16 Action Complaint, which Plaintiffs opposed. The Court sustained Facebook's demurrer as to  
17 each cause of action on September 22, 2011 and granted Plaintiffs leave to amend within twenty  
18 (20) days. In compliance with the Court's September 22, 2011 order, Plaintiffs duly filed a First  
19 Amended Consolidated Class Action Complaint on October 12, 2011.

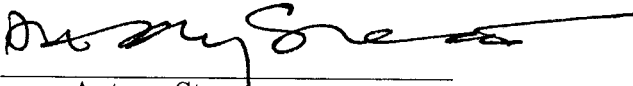
20 6. Plaintiffs have continued their evaluation of the applicable legal claims, along  
21 with consideration of the Court's previous rulings in this matter. They have also considered the  
22 pendency of a proposed nationwide class action case based on similar allegations pending in the  
23 Southern District of Illinois, *E.K.D. v. Facebook, Inc.*, Case No. 3:11-cv-00461-GPM-SCW.  
24 The *E.K.D.* action, if certified as a class action, would potentially protect the interests of  
25 Plaintiffs herein, as well as the putative class members in this action. Based on the foregoing,  
26 Plaintiffs have opted to voluntarily dismiss this consolidated action (Nos. BC444582 and  
27 BC454799) in its entirety without prejudice.

28 7. The pleadings are not yet settled. Plaintiffs have not moved for class certification

1 and no class has been certified. Dismissal of these actions will not prejudice the claims of any  
2 proposed absent class member.

3 8. Neither Plaintiffs nor their counsel have received any consideration, direct or  
4 indirect, in exchange for the dismissal of this consolidated action.

5 I declare under penalty of perjury under the laws of the State of California that the  
6 foregoing is true and correct and that this declaration was executed on November 14, 2011 in  
7 Los Angeles, California.

8  
9 By:   
10 Antony Stuart