

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

E.K.D., by her next friend Melissa K.)
Dawes, and C.M.D., by his next friend)
Jennifer E. DeYong, individually and on)
behalf of all others similarly situated,) No: 3:11-cv-00461-GPM-SCW
)
Plaintiffs,) CLASS ACTION
)
v.)
)
FACEBOOK, INC.,)
)
Defendant.)

**DEFENDANT FACEBOOK, INC.’S
INITIAL DISCLOSURES (FED. R. CIV. P. 26(a)(1))**

Defendant Facebook, Inc. (“Facebook”) makes the following initial disclosures, as required by Federal Rule of Civil Procedure 26(a)(1). These disclosures are based on information reasonably available to Facebook at this time. Facebook reserves the right to supplement, alter, or amend its initial disclosures as discovery progresses and as further information becomes available through further investigation or discovery. Facebook reserves its right to object to any discovery propounded by Plaintiffs.

I. DISCLOSURE OF INDIVIDUALS (RULE 26(a)(1)(A)(i))

Subject to the above qualifications, and without prejudice to Facebook’s right to offer testimony at trial or elsewhere from any of the following individuals on topics other than specified below, Facebook discloses the following individuals under Rule 26(a)(1)(A)(i):

Facebook Employees

| | Individual | Contact Information | Subject Matter |
|----|-------------------|-------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. | Neville Bowers | c/o Cooley LLP 101 California Street, 5th floor San Francisco, CA 94111 | <ul style="list-style-type: none"> • Product details • Technical specifications related to advertisements or sponsored content • Facebook's display of advertisements or sponsored content |
| 2. | Kang-Xing Jin | c/o Cooley LLP 101 California Street, 5th floor San Francisco, CA 94111 | <ul style="list-style-type: none"> • Product details • Technical specifications related to advertisements or sponsored content • Facebook's display of advertisements or sponsored content |
| 3. | Tim Kendall | c/o Cooley LLP 101 California Street, 5th floor San Francisco, CA 94111 | <ul style="list-style-type: none"> • Product details • Facebook's display of advertisements or sponsored content |
| 4. | Ning Li | c/o Cooley LLP 101 California Street, 5th floor San Francisco, CA 94111 | <ul style="list-style-type: none"> • Product details • Technical specifications related to advertisements or sponsored content • Facebook's display of advertisements or sponsored content |
| 5. | Gokul Rajaram | c/o Cooley LLP 101 California Street, 5th floor San Francisco, CA 94111 | <ul style="list-style-type: none"> • Product details • Facebook's display of advertisements or sponsored content |
| 6. | Kent Schoen | c/o Cooley LLP 101 California Street, 5th floor San Francisco, CA 94111 | <ul style="list-style-type: none"> • Product details • Facebook's display of advertisements or sponsored content |
| 7. | Jim Squires | c/o Cooley LLP 101 California Street, 5th floor San Francisco, CA 94111 | <ul style="list-style-type: none"> • Product details • Facebook's display of advertisements or sponsored content |
| 8. | Ami Vora | c/o Cooley LLP 101 California Street, 5th floor San Francisco, CA 94111 | <ul style="list-style-type: none"> • Product details • Facebook's display of advertisements or sponsored content |

| | Individual | Contact Information | Subject Matter |
|----|-------------------|-------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9. | Philip Zigoris | c/o Cooley LLP 101 California Street, 5th floor San Francisco, CA 94111 | <ul style="list-style-type: none"> • Product details • Technical specifications related to advertisements or sponsored content • Facebook's display of advertisements or sponsored content |

Named Plaintiffs

| | Individual | Contact Information | Subject Matter |
|----|-------------------|----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. | E.K.D. | (Plaintiff) | <ul style="list-style-type: none"> • Communications on, use of, and interactions with Facebook, knowledge of operation of Facebook website, and interest in name and likeness • Communications on, use of, and interactions with other social networking and interactive websites on which users' names or likenesses are displayed (e.g., MySpace, Twitter, LinkedIn, Ning, Pandora, YouTube, Amazon, eBay, Flickr, Tumblr, Yelp, Etsy, Trip Advisor, Match.com, Wordpress.com, Blogspot) • Communications with legal guardian on and regarding use of Facebook and other social networking and interactive websites |

| | Individual | Contact Information | Subject Matter |
|----|-------------------|----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2. | C.M.D. | (Plaintiff) | <ul style="list-style-type: none"> • Communications on, use of, and interaction with Facebook services, knowledge of operation of Facebook website, and interest in name and likeness • Communications on, use of, and interactions with other social networking and interactive websites on which users' names or likenesses are displayed (e.g., MySpace, Twitter, LinkedIn, Ning, Pandora, YouTube, Amazon, eBay, Flickr, Tumblr, Yelp, Etsy, Trip Advisor, Match.com, Wordpress.com, Blogspot) • Communications with legal guardian on and regarding use of Facebook and other social networking and interactive websites |
| 3. | Melissa K. Dawes | (Plaintiff) | <ul style="list-style-type: none"> • Communications on, use of, and interaction with Facebook services, knowledge of operation of Facebook website • Communications on, use of, and interactions with other social networking and interactive websites on which users' names or likenesses are displayed (e.g., MySpace, Twitter, LinkedIn, Ning, Pandora, YouTube, Amazon, eBay, Flickr, Tumblr, Yelp, Etsy, Trip Advisor, Match.com, Wordpress.com, Blogspot) • Communications with E.K.D. regarding use of Facebook and other social networking and interactive websites • Knowledge of E.K.D.'s use of Facebook and other social networking and interactive websites |

| | Individual | Contact Information | Subject Matter |
|----|--------------------|----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4. | Jennifer E. DeYong | (Plaintiff) | <ul style="list-style-type: none"> • Communications on, use of, and interaction with Facebook services, knowledge of operation of Facebook website • Communications on, use of, and interactions with other social networking and interactive websites on which users' names or likenesses are displayed (e.g., MySpace, Twitter, LinkedIn, Ning, Pandora, YouTube, Amazon, eBay, Flickr, Tumblr, Yelp, Etsy, Trip Advisor, Match.com, Wordpress.com, Blogspot) • Communications with C.M.D. regarding use of Facebook and other social networking and interactive websites • Knowledge of C.M.D.'s use of Facebook and other social networking and interactive websites |

II. DESCRIPTION OF DOCUMENTS IN FACEBOOK'S POSSESSION, CUSTODY, OR CONTROL (RULE 26(a)(1)(A)(ii))

The categories of documents listed below are at Facebook:

1. Documents concerning the named plaintiffs' and putative class members' Facebook accounts and activity, if available and subject to the named plaintiffs' confirmation of their User IDs (UIDs).

2. Documents concerning Facebook's Statement of Rights and Responsibilities, Privacy Policy, and other applicable terms and/or policies.

3. Documents concerning information provided in the Facebook Help Center regarding advertisements or sponsored content on Facebook.

4. Documents concerning documents provided to potential advertisers or sponsors regarding advertisements or sponsored content on Facebook.

III. COMPUTATION OF DAMAGES (RULE 26(a)(1)(A)(iii))

Facebook contends that Plaintiffs have not sustained any damages caused by any act or omission attributable to Facebook. At present, Facebook claims recovery of costs and attorneys' fees. Facebook reserves the right, however, to assert a claim for damages in the future if doing so is warranted by information revealed or counterclaims asserted during the litigation.

IV. INSURANCE AGREEMENTS (RULE 26(a)(1)(A)(iv))

Facebook has no applicable insurance policies to disclose at this time.

Dated: October 9, 2011

/s/ Matthew D. Brown

Matthew D. Brown

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Certificate of Service

I hereby certify that on October 9, 2011, I served the forgoing document on the following individuals via electronic mail:

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