

EXHIBIT E

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

E.K.D., et al., individually and on)	
behalf of all others similarly situated,)	
)	
Plaintiffs,)	Cause No: 3:11-cv-00461-GPM-SCW
)	
vs.)	
)	CLASS ACTION
FACEBOOK, INC.,)	
)	
Defendant.)	

PLAINTIFFS' INITIAL REQUEST FOR PRODUCTION OF DOCUMENTS

COME NOW Plaintiffs, individually, and on behalf of all others similarly situated, by and through their undersigned counsel, and pursuant to Fed. R. Civ. P. 34, serve the following request for production of documents upon defendant to be answered within thirty-days hereafter.

DEFINITIONS AND INSTRUCTIONS

For the purposes of answering these Requests for Production of Documents, Plaintiffs hereby incorporate and include all definitions and instructions contained in Plaintiffs' Initial Interrogatories as if fully restated herein.

REQUESTS FOR PRODUCTION

1. Produce each DOCUMENT IDENTIFIED in YOUR responses to Plaintiffs' discovery in this matter.
2. Produce all organizational charts reflecting Facebook's management or organizational structure.
3. Produce all company directories.
4. Produce all DOCUMENTS RELATING TO surveillance, investigation or other information gathering RELATING TO any of the Plaintiffs in this action, their immediate family members, Plaintiffs' counsel of record, Plaintiffs' disclosed witnesses in this case, or any

Judge or other judicial officer that may preside over this action. This request includes, but is not limited to, public records and financial or criminal background checks obtained.

5. Produce every DOCUMENT that memorializes the content of any communication with or statement, meeting or interview of any person RELATED TO facts or circumstances regarding this case. This includes signed or unsigned written statements, court reporter statements, statements on records, tapes or discs, or memorandum of statements in any form.

6. Produce exemplar copies of all marketing materials provided to potential advertisers RELATED TO the association of user's names and profile pictures with ADVERTISEMENTS.

7. Produce all DOCUMENTS RELATING TO the anticipated or projected income or revenue from the sale, licensing or use of ADVERTISEMENTS associated with the name, profile picture, or identity of YOUR users.

8. Produce all written discovery responses, excluding actual document production, exchanged with an adverse party in every lawsuit and governmental investigation RELATING TO the association of a user's name or likeness with an ADVERTISEMENT.

9. Produce all deposition and hearing transcripts and recordings, in their native electronic format, from every lawsuit or governmental investigation RELATING TO the association of a user's name or likeness with an ADVERTISEMENT.

10. Produce the curriculum vitae, transcripts of any testimony given in the last four years, all publications authored in the last 10 years, and all bills, receipts or invoices issued to YOU from each person identified in YOUR responses to Plaintiffs' Interrogatories or under Fed. R. Civ. P. 26(a)(2)(B) as person who you expect to testify on YOUR behalf.

11. Produce all correspondence exchanged with each person identified in YOUR

responses to Plaintiffs' Interrogatories or under Fed. R. Civ. P. 26(a)(2)(B) as a person who you expect to testify on YOUR behalf that relates to compensation for the witness's work or testimony, or identifies facts, data or any assumption the witness considered in forming the witness's testimony.

12. Produce all documents describing the use or contents of any database identified in YOUR responses to Plaintiffs' Interrogatories as containing information that could be used to respond to Interrogatory number 13.

13. Produce all correspondence between YOU and any third-party relating to this action.

Dated: October 5, 2011

Respectfully submitted,

KOREIN TILLERY

/s Aaron M. Zigler
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CERTIFICATE OF SERVICE

I hereby certify that on October 28, 2011, I electronically served the foregoing document on the following:

- Matthew D. Brown
- Jeffrey M. Gutkin
- Michael C. Hermann
- Michael G. Rhodes
- Charles J. Swartwout
- Steven A. Katz
- Mark J. Tamblyn
- Ian J. Barlow

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