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 FACEBOOK, INC.

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA
 13 SAN JOSE DIVISION

15 In re: Facebook Internet Tracking Litigation

Case No. 5:12-md-02314 EJD

**EXHIBIT C TO DECLARATION OF KYLE
 C. WONG IN SUPPORT OF DEFENDANT
 FACEBOOK, INC.'S MOTION FOR
 PROTECTIVE ORDER**

Date: April 28, 2016
 Time: 9:00 a.m.
 Courtroom: 4
 Judge: Edward J. Davila
 Trial Date: None Set

24 **EXHIBIT C**

Wong, Kyle

From: David Straite <dstraite@kaplanfox.com>
Sent: Tuesday, August 20, 2013 1:28 PM
To: Wong, Kyle
Cc: 'Jim Frickleton'; 'Stephen Grygiel'
Subject: In re: Facebook Internet Tracking Litig. -- confidentiality stipulation
Attachments: Facebook Internet Tracking MDL -- Revised draft confidentiality stip 20 AUG 2013 revision.docx

Dear Kyle,

It has been a while since we've emailed, and I hope you are doing well. I write with respect to the Facebook Internet Tracking MDL.

The last time we emailed was in February, and I believe we had just about finished the confidentiality stipulation/order. I sent you a revision on February 12, 2013, and you sent back your comments on February 20, 2013. We are now prepared to accept all of your comments and revisions mentioned in your Feb. 20 email. I've attached the most recent draft to this email, with edits to reflect your Feb. 20 email. I also added a new section 13.6 to reflect our (tentative) agreement with respect to the priv logs, edited to include the two in-house lawyers you requested.

If the terms are still acceptable, I will remove track-changes, re-circulate, and have our local counsel file – unless you prefer that Cooley file. We are fine either way.

Finally, as you know, my former firm (Stewarts Law) closed its US offices; please note that I have joined Kaplan Fox as *Of Counsel* in the New York office and my contact information is below. I also still have my solo practice on the side (STRAITE PLLC) and thus you can always contact me at david@straite.com; both email addresses get to me in real time. Feel free to use whichever address is easier.

Kindest regards,

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