

1 COOLEY LLP
 2 MICHAEL G. RHODES (116127)
 (rhodesmg@cooley.com)
 3 MATTHEW D. BROWN (196972)
 (brownmd@cooley.com)
 4 JEFFREY M. GUTKIN (216083)
 (jgutkin@cooley.com)
 5 KYLE C. WONG (224021)
 (kwong@cooley.com)
 6 ADAM C. TRIGG (261498)
 (atrigg@cooley.com)
 7 101 California Street, 5th Floor
 San Francisco, CA 94111-5800
 Telephone: (415) 693-2000
 8 Facsimile: (415) 693-2222

9 Attorneys for Defendant
 10 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 G 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

EXHIBIT G

Wong, Kyle

From: David Straite <dstraite@kaplanfox.com>
Sent: Tuesday, February 23, 2016 12:02 PM
To: Wong, Kyle
Cc: Trigg, Adam; Stephen G.Grygiel
Subject: In re Facebook Internet Tracking Litig.

Dear Kyle,

Thank you for the follow-up discovery meet-and-confer teleconference today. This email will memorialize the details as I understand them, but please let me know if you disagree:

1. We discussed ways your client could prioritize next steps in discovery as an alternative to cross-motions to compel or to stay discovery. We agreed that no party will file a discovery motion for at least a week to allow you to confer with your client, and for counsel to confer one last time next week.

2. From the plaintiffs' perspective, the priority items are as follows. If we can agree to a priority schedule for these, we can then discuss which other specific discovery objections or other outstanding issues should be addressed now, and which could be deferred for the time being.

- a. Help center pages;
- b. Documents related to the named plaintiffs;
- c. First three depositions; and
- d. Searching a limited number of additional custodians (we proposed 10 at once, or two back-to-back productions from 5 custodians and then a subsequent 5), and deferring additional searches until we have reviewed the newly produced documents.

David A. Straite
Kaplan Fox & Kilsheimer LLP
850 Third Avenue
New York, NY 10022
Tel. +1.212.687.1980
Fax +1.212.687.7714