

1 Jay Barnes (*pro hac vice* to be sought)
 2 **BARNES & ASSOCIATES**
 219 East Dunklin St., Suite A
 3 Jefferson City, MO 65101
 Telephone: (573) 634-8884
 4 Facsimile: (573) 635-6291
jaybarnes5@zoho.com

5
 6 *Proposed Interim Steering Committee Member*

7 **UNITED STATES DISTRICT COURT**
 8 **NORTHERN DISTRICT OF CALIFORNIA**
 9 **SAN JOSE DIVISION**

Case No.: 5:12-MD-02314-EJD

10 IN RE: FACEBOOK INTERNET
 11 TRACKING LITIGATION

**DECLARATION OF JAY BARNES IN
 SUPPORT OF MOTION FOR
 ADMINISTRATIVE RELIEF TO AMEND
 CONSOLIDATION ORDER**

Judge: The Honorable Edward J. Davila
 Court Room: 4

15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 I, Jay Barnes, declare as follows:

2 1. I am an attorney at the law firm of Barnes & Associates, and am counsel of record
3 for Chandra L. Thompson in the individual case *Thompson v. Facebook, Inc.*, No. 5:12-cv-00676-
4 EJD (N.D. Cal.), consolidated with this MDL.

5 2. Movants and plaintiffs Matthew Vickery, Perrin Davis, Brian Lentz and Cynthia
6 Quinn move this Court for an Order modifying the previous order of consolidation and
7 appointment of lead counsel.

8 3. I am an elected member of the Missouri General Assembly, and I currently chair
9 the Government Oversight and Accountability Committee.

10 4. On December 11, 2014, I personally argued the appeal of *In re: Google, Inc.*
11 *Cookie Placement Consumer Privacy Litigation*, No. 13-4300, before the United States Court of
12 Appeals for the Third Circuit.

13 5. The interim executive committee have asked me to join the interim steering
14 committee in advance of the April 28, 2016 oral arguments on defendant Facebook's pending
15 motion to dismiss. Subject to court approval, I accept the invitation.

16 6. I declare under penalty of perjury under the laws of the United States that the
17 foregoing is true and correct.

18 Executed this 21st day of March, 2016, in Jefferson City, MO.

19
20 
21 Jason "Jay" Barnes

22
23
24
25
26
27
28

ATTESTATION OF E-FILED SIGNATURE

I, David A. Straite, court-appointed interim co-lead counsel for the proposed Class, am the ECF User whose ID and password are being used to file this Declaration of Jay Barnes. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Mr. Barnes has concurred in this filing.

/s/ David A. Straite

David A. Straite

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28