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14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN JOSE DIVISION

17 In re: Facebook Internet Tracking Litigation

18 Case No. 12-md-02314 EJD

19 **STIPULATION AND [PROPOSED] ORDER**
 20 **REQUESTING LIMITED REDACTION OF**
 21 **NOVEMBER 16, 2017 HEARING**
 22 **TRANSCRIPT**

23 **JUDGE:** Hon. Edward J. Davila
 24 **COURTROOM:** 4

25 Plaintiffs Perrin Davis, Cynthia Quinn, Brian Lentz, and Matthew Vickery (collectively,
 26 “Plaintiffs”) and Defendant Facebook, Inc. (“Facebook”) (Plaintiffs and Facebook collectively,
 27 the “Parties”), by and through their respective counsel, hereby make a stipulated request for an
 28 order redacting one sentence in the Transcript from the November 16, 2017 Hearing on
 Facebook’s Motion to Dismiss (“Hearing Transcript”).

WHEREAS during the November 16, 2017 hearing on Facebook’s Motion to Dismiss,
 counsel for Plaintiffs made a reflecting certain discovery material designated Highly Confidential

1 by Facebook pursuant to the Stipulated Protective Order entered in this case (“Protective Order”)
2 (ECF No. 75);

3 WHEREAS the discovery material was quoted in and attached to Plaintiffs’ Second and
4 Third Consolidated Amended Class Action Complaints, was addressed in two previous
5 administrative motions to seal,¹ and has twice been ordered sealed by the Court (ECF No. 150;
6 ECF No. 170) (collectively “Sealing Orders”);

7 WHEREAS the Parties’ counsel have conferred and agreed that a limited redaction of one
8 sentence in the Hearing Transcript would be consistent with the Protective Order and this Court’s
9 previous Sealing Orders;

10 NOW, THEREFORE, the Parties hereby agree that redaction of the sentence contained in
11 the Hearing Transcript at page 25, lines 20-21 (as indicated in Exhibits A and B to the
12 Declaration of Kyle Wong filed concurrently herewith) is narrowly tailored to conform the
13 transcript to the Protective Order and the Sealing Orders, and hereby make this stipulated request
14 that the Court order this sentence to be redacted from any publicly available version of the
15 Hearing Transcript.

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25 ¹ See Defendant Facebook’s Response to Plaintiffs’ Administrative Motion to File Under Seal
26 (ECF No. 94); Declaration of Natalie Naugle in Support of Defendant Facebook, Inc.’s Response
27 to Plaintiffs’ Administrative Motion to File Under Seal (ECF No. 94-1) at ¶¶ 2, 5; Defendant
28 Facebook, Inc.’s Response to Plaintiffs’ Administrative Motion to Seal (ECF No. 158);
Declaration of Natalie Naugle in Support of Defendant Facebook Inc.’s Response to Plaintiffs’
Administrative Motion to File Under Seal (ECF No. 158-2) at ¶¶ 2, 4.

1 Dated: December 13, 2017

COOLEY LLP

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/s/ Matthew D. Brown

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MATTHEW D. BROWN

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Attorneys for Defendant FACEBOOK, INC.

5 Dated: December 13, 2017

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/s/ David A. Straite

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[PROPOSED] ORDER

The Court has considered the foregoing Stipulation by which the Parties request the limited redaction of one sentence contained in the November 16, 2017 Hearing Transcript at page 25, lines 20-21 (as indicated in Exhibits A and B to the Declaration of Kyle Wong filed concurrently with the Stipulation). For the reasons set forth in the Stipulation and in this Court’s Orders of July 5, 2017 (ECF No. 150) and November 8, 2017 (ECF No. 170), it is hereby ORDERED that such sentence shall be redacted from any publicly available version of the Hearing Transcript, including, but not limited to, any electronic version of the transcript available to public terminal users at the courthouse or through the ECF or PACER systems. The unredacted version of the Hearing Transcript shall be placed under seal.

Document	Page/Line	Ruling
Nov. 16, 2017 Hearing Transcript	Sentence contained on page 25, lines 20-21	Granted

DATED: _____

The Honorable Edward J. Davila
UNITED STATES DISTRICT JUDGE

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ATTESTATION

In accordance with Northern District of California Local Rule 5-1(i)(3), I hereby attest that I have obtained concurrence in the filing of this Declaration from the signatories listed above.

/s/ Matthew D. Brown
MATTHEW D. BROWN

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