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12 Attorneys for Defendant
 13 FACEBOOK, INC.

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

17 In re: Facebook Internet Tracking Litigation

18 Case No. 5:12-md-02314 EJD

19 **DECLARATION OF SANDEEP SOLANKI IN**
 20 **SUPPORT OF DEFENDANT FACEBOOK,**
 21 **INC.'S REPLY IN SUPPORT OF ITS**
 22 **MOTION TO DISMISS PLAINTIFFS'**
 23 **CORRECTED FIRST AMENDED**
 24 **CONSOLIDATED CLASS ACTION**
 25 **COMPLAINT (FED. R. CIV. P. 12(b)(1) &**
 26 **12(b)(6))**

27 **DATE:** October 5, 2012
 28 **TIME:** 9:00 a.m.
COURTROOM: 4
JUDGE: Edward J. Davila
TRIAL DATE: None Set

29 I, Sandeep Solanki, hereby declare as follows:

30 1. I am an attorney employed as Lead Litigation Counsel by Defendant Facebook,
 31 Inc. ("Facebook"). Except as otherwise noted, I have personal knowledge of the following facts
 32 and if called to testify could and would testify competently thereto.

1 2. Facebook’s Privacy Policy (also known as Facebook’s “Data Use Policy” as of
2 September 23, 2011) discloses, among other things, what information Facebook receives and how
3 that information is used. The Privacy Policy is posted on the Facebook website, and can be
4 found, among other ways, by clicking on a link titled “Privacy Policy” in the SRR, and by
5 clicking on a link titled “Privacy” at the bottom of most pages on the Facebook website. Users
6 must acknowledge that they have read Facebook’s Privacy Policy when registering for the site.
7 Attached as **Exhibit A** is a true and correct copy of Facebook’s Privacy Policy that was effective
8 as of December 22, 2010 (this Privacy Policy indicates, “Date of last revision: December 22,
9 2010”).

10 3. I declare under penalty of perjury that the foregoing is true and correct.

11 Executed on August 22, 2012 at Menlo Park, California.

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/s/ Sandeep Solanki

Sandeep Solanki

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ATTESTATION

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

/s/ Matthew D. Brown
MATTHEW D. BROWN

2637330/ST