

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

8 Attorneys for Defendant FACEBOOK, INC.

9
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25
 26
 27
 28

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

In re: Facebook Internet Tracking Litigation

Case No. 12-md-02314 EJD

**[PROPOSED] ORDER GRANTING IN PART
 PLAINTIFFS' ADMINISTRATIVE MOTION
 TO FILE UNDER SEAL**

JUDGE: Edward J. Davila
COURTROOM: 4
TRIAL DATE: Not Yet Set

1 **THIS MATTER**, having come before the Court on Plaintiffs’ Administrative Motion to
2 File Portions of Second Amended Consolidated Complaint Under Seal, filed on November 30,
3 2015 (Dkt. No. 90) and Plaintiffs’ Corrected Administrative Motion to File Portions of Second
4 Amended Consolidated Complaint Under Seal, filed on December 1, 2015 (Dkt. No. 92)
5 (together, “Plaintiffs’ Administrative Motion”) and the Court having considered Plaintiffs’
6 Administrative Motion and the Declaration of David A. Straite and Corrected Declaration of
7 David A. Straite (together, the “Straite Declaration”) filed contemporaneously therewith,
8 Facebook’s Response to Plaintiffs’ Administrative Motion, and the Declaration of Natalie Naugle
9 filed contemporaneously therewith:

10 The Court finds that compelling reasons have been shown to support the filing under seal
11 of the documents and portions of documents described herein. Accordingly,

12 IT IS ORDERED that the following documents shall be filed under seal and sealed from
13 the public record:

14 1. Exhibit M to the Second Amended Consolidated Complaint and the Corrected
15 Second Amended Consolidated Complaint (together, the “Amended Complaint”) (also filed as
16 part of Exhibit 2 to the Straite Declaration);

17 2. Exhibit N to the Amended Complaint (also filed as part of Exhibit 2 to the Straite
18 Declaration);

19 3. Exhibit O to the Amended Complaint (also filed as part of Exhibit 2 to the Straite
20 Declaration);

21 4. Exhibit P to the Amended Complaint (also filed as part of Exhibit 2 to the Straite
22 Declaration);

23 5. Exhibit Q to the Amended Complaint (also filed as part of Exhibit 2 to the Straite
24 Declaration);

25 6. Exhibit S to the Amended Complaint (also filed as part of Exhibit 2 to the Straite
26 Declaration);

27 7. Exhibit T to the Amended Complaint (also filed as part of Exhibit 2 to the Straite
28 Declaration);

- 1 8. Exhibit U to the Amended Complaint (also filed as part of Exhibit 2 to the Straite
2 Declaration);
- 3 9. Exhibit V to the Amended Complaint (also filed as part of Exhibit 2 to the Straite
4 Declaration);
- 5 10. Exhibit W to the Amended Complaint (also filed as part of Exhibit 2 to the Straite
6 Declaration);
- 7 11. Exhibit X to the Amended Complaint (also filed as part of Exhibit 2 to the Straite
8 Declaration);
- 9 12. Exhibit Y to the Amended Complaint (also filed as part of Exhibit 2 to the Straite
10 Declaration);
- 11 13. Exhibit AA to the Amended Complaint (also filed as part of Exhibit 2 to the Straite
12 Declaration);
- 13 14. Exhibit 3 to the Straite Declaration (also filed as the Amended Complaint) with the
14 redacted version lodged with the Court by Facebook on December 4, 2015 filed in the public
15 record.

Document	Paragraph or Page/Line	Ruling
Exhibit M to the Amended Complaint	Sealed entirely.	Granted.
Exhibit N to the Amended Complaint	Sealed entirely.	Granted.
Exhibit O to the Amended Complaint	Sealed entirely.	Granted.
Exhibit P to the Amended Complaint	Sealed entirely.	Granted.
Exhibit Q to the Amended Complaint	Sealed entirely.	Granted.
Exhibit R to the Amended Complaint	Sealed entirely.	Denied.
Exhibit S to the Amended Complaint	Sealed entirely.	Granted.
Exhibit T to the Amended Complaint	Sealed entirely.	Granted.
Exhibit U to the Amended Complaint	Sealed entirely.	Granted.

Document	Paragraph or Page/Line	Ruling
Exhibit V to the Amended Complaint	Sealed entirely.	Granted.
Exhibit W to the Amended Complaint	Sealed entirely.	Granted.
Exhibit X to the Amended Complaint	Sealed entirely.	Granted.
Exhibit Y to the Amended Complaint	Sealed entirely.	Granted.
Exhibit AA to the Amended Complaint	Sealed entirely.	Granted.
Exhibit 3 to the Straite Declaration	Page 2, lines 1-2 Page 10, lines 24, 25, 26-27, 28 Page 11, lines 1-2, 24, 26 Page 12, line 5 Page 14, lines 10-11, 13-16 Page 16, lines 15-16, 17, 19-21, 24-25 Page 17, lines 5-7, 9, 10-11, 11-12, 15-16 Page 18, lines 4-5, 5-7, 8, 10-16, 18-19, 21-25, 27-28 Page 19, lines 2, 3-4, 6-8, 8-9, 10-12, 16, 17-19, 20-21, 22, 25-26, 28 Page 20, lines 1, 3-5 Page 26, lines 22-23, 28 Page 27, lines 1-2, 6, 17-25	Granted.

Dated: _____, 2015

 Hon. Edward J. Davila
 U.S. District Court, Northern District of California