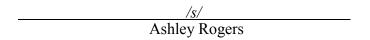
Campbell et al v. Facebook Inc.

Doc. 102 Att. 1

I, Ashley Rogers, declare as follows:

- 1. I am an attorney admitted to practice law before this Court. I am an associate in the law firm of Gibson, Dunn & Crutcher LLP, and I am one of the attorneys responsible for representing Defendant Facebook, Inc. in the above-captioned action. I submit this declaration in support of Facebook's Administrative Motion to File Portions of Its Opposition to Plaintiffs' Motion to Withdraw Plaintiff David Shadpour Without Prejudice. Unless otherwise stated, the following facts are within my personal knowledge and, if called and sworn as a witness, I could and would testify competently to these facts.
- 2. Pursuant to Civil Local Rule 79-5(d), during the afternoon on July 27, 2015, I informed Plaintiffs' counsel via e-mail that Facebook planned to file under seal Plaintiff David Shadpour's Corrected Objections and Responses to Facebook's First Set of Interrogatories ("Shadpour's Interrogatory Responses"), which Plaintiffs had designated as "Highly Confidential Attorneys' Eyes Only" in its entirety, unless Plaintiffs stated that the information could be filed publicly. I also asked Plaintiffs whether Facebook needed to file under seal a portion of Facebook's Opposition to Plaintiffs' Motion to Withdraw Plaintiff David Shadpour Without Prejudice that references the fact that that Plaintiff Shadpour sent and received Facebook messages containing URLs and that he used other social networking and email services, which is information that we learned from Shadpour's Interrogatory Responses. Plaintiffs did not respond to the email by the time Facebook had to file its brief and application.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct, and that I executed this Declaration in Dallas, Texas, on July 27, 2015.



## ATTORNEY ATTESTATION

Pursuant to Civil Local Rule 5-1, I, Christopher Chorba, hereby attest that concurrence in the filing of this document has been obtained from Ashley Rogers.

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2	Dated. July 27, 2015	Christopher Chorba
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