

# Exhibit 2

## Rogers, Ashley

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**From:** Rudolph, David T. <drudolph@lchb.com>  
**Sent:** Thursday, April 30, 2015 3:16 PM  
**To:** Chorba, Christopher; Jessen, Joshua A.  
**Cc:** Sobol, Michael W.  
**Subject:** Campbell v. Facebook  
**Attachments:** Stipulation to Dismiss Plaintiff Shadpour.DOCX

Chris and Josh,

As we discussed during a prior meet and confer, David Shadpour intends to withdraw as a plaintiff in this case. We've drafted the attached stipulation regarding his withdrawal; please let us know if you have any comments or if we have your permission to file it.

Thanks.

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19 *Class*

20 UNITED STATES DISTRICT COURT  
21 NORTHERN DISTRICT OF CALIFORNIA

22 MATTHEW CAMPBELL, MICHAEL  
23 HURLEY, and DAVID SHADPOUR, on  
24 behalf of themselves and all others  
similarly situated,

25 Plaintiffs,

26 v.

27 FACEBOOK, INC.,

28 Defendant.

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Case No. C 13-05996 PJH (MEJ)

**STIPULATION TO DISMISS NAMED  
PLAINTIFF DAVID SHADPOUR**

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WHEREAS, on December 30, 2013, Matthew Campbell and Michael Hurley brought a putative class action alleging that Defendant, Facebook, Inc., had violated the Electronic Communications Privacy Act (“ECPA”), the California Invasion of Privacy Act (“CIPA”), and California Business & Professions Code §§ 17200 *et seq.* (the “UCL”) (Dkt. 1);

WHEREAS, on January 21, 2014, David Shadpour initiated a separate putative class action, *Shadpour v. Facebook, Inc.*, Case No. 5:14-cv-00307-PSG, which was predicated upon substantially similar facts and alleged claims under CIPA and the UCL;

WHEREAS, on January 29, 2014, Facebook filed a Motion to Relate the *Shadpour* action to the *Campbell* action (Dkt. 14), which the Court granted on February 3, 2014 (Dkt. 15);

WHEREAS, on March 21, 2014, Plaintiffs filed a Motion to Consolidate the *Campbell* and *Shadpour* actions (Dkt. 18), which the Court granted on April 15, 2014 (Dkt. 24);

WHEREAS, on April 25, 2014, Plaintiffs filed the operative consolidated complaint naming as Plaintiffs Matthew Campbell, Michael Hurley, and David Shadpour (Dkt. 25);

WHEREAS, David Shadpour no longer believes that he can timely meet the demands of pursuing this litigation and simultaneously meet the demands of work and family and therefore no longer wishes to litigate this case on behalf of himself or members of the putative class;

WHEREAS, in light of the above, David Shadpour seeks to withdraw as a named plaintiff, to voluntarily dismiss his claims, without prejudice, pursuant to Fed. R. Civ. P. 21 and 41(a)(1)(A)(ii);

WHEREAS, named plaintiffs Matthew Campbell and Michael Hurley will continue to represent the interests of the putative class;

NOW THEREFORE, the Parties, by and through their respective undersigned counsel, hereby stipulate that pursuant to Fed. R. Civ. P. 21 and 41(a)(1)(A)(ii), David Shadpour shall hereby withdraw as a named plaintiff and voluntarily dismisses his individual claims, without prejudice, subject to any rights he may have as a member of the putative class.

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Dated: May \_\_, 2015

LIEFF CABRASER HEIMANN & BERNSTEIN  
LLP

By: /s/ draft  
Michael W. Sobol  
Attorneys for Plaintiffs

Dated: May \_\_, 2015

GIBSON, DUNN & CRUTCHER, LLP

By: /s/ draft  
Joshua A. Jessen  
Attorneys for Defendant Facebook, Inc.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: May \_\_, 2015

By: \_\_\_\_\_  
The Honorable Phyllis J. Hamilton  
United States District Judge

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**ATTESTATION PURSUANT TO GENERAL ORDER 45**

I, Michael W. Sobol, am the ECF user whose identification and password are being used to file this Stipulation. I hereby attest that Joshua A. Jessen has concurred in this filing.

DATED: May \_\_, 2015

/s/ draft  
Michael W. Sobol