

EXHIBIT 20

Gardner, Melissa

From: Jessen, Joshua A. <JJessen@gibsondunn.com>
Sent: Wednesday, September 02, 2015 11:03 AM
To: Hank Bates
Cc: Chorba, Christopher; Rudolph, David T.; Sobol, Michael W.; Allen Carney; David Slade; Gardner, Melissa; Diamand, Nicholas; Maute, Jeana Bisnar; Rogers, Ashley
Subject: RE: Campbell v. Facebook

Counsel –

In advance of the meet-and-confer conference you requested today, I wanted to pass along the following information (which our discovery responses will be supplemented to reflect).

Facebook has conducted a reasonable search and diligent inquiry and has not located any documents responsive to the following requests contained in Plaintiffs' Third Set of Requests for Production:

Request No. 54

All Documents and ESI relating to Your efforts, or efforts by Third Parties on Your behalf—whether undertaken or contemplated but not undertaken—to assign a monetary value to the data contained within, or data received or content collected from, Private Messages, and/or any additional information derived therefrom.

Request No. 55

All Documents and ESI sufficient to identify the number of web pages with “Like” Social Plugins embedded, by month, during the Relevant Time Period.

Request No. 57

All Documents and ESI sufficient to identify the number of Passive Likes generated, by month, during the Relevant Time Period.

If you nonetheless wish to proceed with the meet-and-confer conference, please identify the requests you want to discuss and let us know who will be attending so we can pass the name(s) along to building security.

Finally, in light of the supplemental response to Interrogatory No. 8 and document production we made yesterday, we obviously won't be exchanging letter briefs on those issues today.

Thanks,

Josh

Joshua A. Jessen

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-----Original Message-----

From: Jessen, Joshua A.

Sent: Monday, August 31, 2015 4:43 PM

To: 'Hank Bates'

Cc: Chorba, Christopher; Rudolph, David T.; Sobol, Michael W.; Allen Carney; David Slade; Gardner, Melissa; Diamand, Nicholas; Maute, Jeana Bisnar

Subject: RE: Campbell v. Facebook

Thanks. See you at our SF office at 1 p.m. on Wednesday.

Joshua A. Jessen

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-----Original Message-----

From: Hank Bates [mailto:hbates@cbplaw.com]

Sent: Monday, August 31, 2015 3:02 PM

To: Jessen, Joshua A.

Cc: Chorba, Christopher; Rudolph, David T.; Sobol, Michael W.; Allen Carney; David Slade; Gardner, Melissa; Diamand, Nicholas; Maute, Jeana Bisnar

Subject: RE: Campbell v. Facebook

Let's do 1pmon Wednesday in San Francisco. The reproduction of the Blue Hog Report messages will be within the next couple days.

Thanks.

Hank Bates

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-----Original Message-----

From: Jessen, Joshua A. [mailto:JJessen@gibsondunn.com]

Sent: Monday, August 31, 2015 2:05 PM

To: Hank Bates <hbates@cbplaw.com>

Cc: Chorba, Christopher <CChorba@gibsondunn.com>; Rudolph, David T. <drudolph@lchb.com>; Sobol, Michael W. <MSOBOL@lchb.com>; Allen Carney <acarney@cbplaw.com>; David Slade <dslade@cbplaw.com>; Gardner, Melissa <mgardner@lchb.com>; Diamand, Nicholas <ndiamand@lchb.com>; Maute, Jeana Bisnar <jbisnarmaute@gibsondunn.com>

Subject: RE: Campbell v. Facebook

Hank --

Tuesday won't work, but we are available between 1230 and 230 or after 4 on Wednesday in either our SF office or PA office. Let us know what time/location works best.

Please also let me know when the Blue Hog Report messages we discussed on August 10 will be produced with the URL previews (if any) unredacted.

Thanks,

Joshua A. Jessen

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-----Original Message-----

From: Hank Bates [mailto:hbates@cbplaw.com]

Sent: Saturday, August 29, 2015 6:18 AM

To: Jessen, Joshua A.

Cc: Chorba, Christopher; Rudolph, David T.; Sobol, Michael W.; Allen Carney; David Slade; Gardner, Melissa; Diamand, Nicholas; Maute, Jeana Bisnar

Subject: Re: Campbell v. Facebook

Given the time constraints and the time that already has passed since the production response was due, we need to push things along and have the meet and confer in person. What is your availability on Tuesday for an in person meet and confer?

Sent from my iPhone

On Aug 28, 2015, at 7:02 PM, Jessen, Joshua A. <JJessen@gibsondunn.com<mailto:JJessen@gibsondunn.com>> wrote:

Hank --

I expect to have a better idea by Tuesday regarding whether responsive documents exist for several of your requests. I'd suggest we chat after that. And if an in-person meet and confer is still necessary at that time, we can arrange for it to take place next week.

Best,

Josh

Joshua A. Jessen

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From: Hank Bates [mailto:hbates@cbplaw.com]
Sent: Friday, August 28, 2015 10:07 AM
To: Jessen, Joshua A.; Chorba, Christopher
Cc: Rudolph, David T.; Sobol, Michael W.; Allen Carney; David Slade; Gardner, Melissa; Diamand, Nicholas
Subject: Campbell v. Facebook

Josh and Chris,

What is your availability on Monday or Tuesday of next week for an in-person meet and confer regarding the Plaintiffs' Third Set of Discovery? Absent prompt production of the responsive documents or resolution of our issues, we need to seek the assistance of the court, given the time pressures of our schedule.

Hank Bates
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