

# EXHIBIT A

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17 *Attorneys Plaintiffs and the Proposed Class*

18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA

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

23 Plaintiffs,

24 v.

25 FACEBOOK, INC.,

26 Defendant.  
27  
28

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Case No. C 13-5996 PJH

**PLAINTIFFS' SECOND SET OF  
INTERROGATORIES TO DEFENDANT**

1 Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, the Plaintiffs request  
2 that Defendant Facebook respond to the following Interrogatory within thirty (30) days of service.

3 **DEFINITIONS**

- 4 (a) **“(id)”** has the same meaning as described in the following paper: Bronson, *et al*, *TAO: Facebook’s Distributed Data Store for the Social Graph*, USENIX ATC'13 Proceedings  
5 of the 2013 USENIX conference on Annual Technical Conference, § 3.1 (June, 2013)  
6 (available at [https://research.facebook.com/publications/161988287341248/tao-facebook-](https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-data-store-for-the-social-graph/)  
7 [s-distributed-data-store-for-the-social-graph/](https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-data-store-for-the-social-graph/)).
- 8 (b) **“Action”** means the case captioned *Matthew Campbell and Michael Hurley v. Facebook, Inc.*; Case No. C 13-5996 PJH (N. Dist. Cal.).
- 9 (c) **“Association”** has the same meaning as described in the following paper: Bronson, *et al*,  
10 *TAO: Facebook’s Distributed Data Store for the Social Graph*, USENIX ATC'13  
11 Proceedings of the 2013 USENIX conference on Annual Technical Conference, § 3.1  
12 (June, 2013) (available at  
13 [https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-](https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-data-store-for-the-social-graph/)  
14 [data-store-for-the-social-graph/](https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-data-store-for-the-social-graph/)).
- 15 (d) **“Association Type”** or **“(atype)”** has the same meaning as described in the following  
16 paper: Bronson, *et al*, *TAO: Facebook’s Distributed Data Store for the Social Graph*,  
17 USENIX ATC'13 Proceedings of the 2013 USENIX conference on Annual Technical  
18 Conference, § 3.1 (June, 2013) (available at  
19 [https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-](https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-data-store-for-the-social-graph/)  
20 [data-store-for-the-social-graph/](https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-data-store-for-the-social-graph/)).
- 21 (e) **“Communication”** means the conveyance (in the form of facts, ideas, thoughts, opinions,  
22 data, inquiries or otherwise) of information and includes, without limitation,  
23 correspondence, memoranda, reports, presentations, face-to-face conversations, telephone  
24 conversations, text messages, instant messages, voice messages, negotiations, agreements,  
25 inquiries, understandings, meetings, letters, notes, telegrams, mail, email, and postings of  
26 any type.  
27  
28

1 (f) **“Destination Object”** or **“(id2)”** has the same meaning as described in the following  
2 paper: Bronson, *et al*, *TAO: Facebook’s Distributed Data Store for the Social Graph*,  
3 USENIX ATC'13 Proceedings of the 2013 USENIX conference on Annual Technical  
4 Conference, § 3.1 (June, 2013) (available at  
5 [https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-](https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-data-store-for-the-social-graph/)  
6 [data-store-for-the-social-graph/](https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-data-store-for-the-social-graph/)).

7 (g) **“Document(s)”** means all materials within the full scope of Fed. R. Civ. P. 34 including  
8 but not limited to: all writings and recordings, including the originals, drafts and all non-  
9 identical copies, whether different from the original by reason of any notation made on  
10 such copies or otherwise (including but without limitation to, email and attachments,  
11 correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes,  
12 contracts, reports, studies, checks, statements, tags, labels, invoices, brochures,  
13 periodicals, receipts, returns, summaries, pamphlets, books, interoffice and intra-office  
14 Communications, instant messages, chats, offers, notations of any sort of conversations,  
15 working papers, applications, permits, file wrappers, indices, telephone calls, meetings or  
16 printouts, teletypes, telefax, invoices, worksheets, and all drafts, alterations, modifications,  
17 changes and amendments of any of the foregoing), graphic or aural representations of any  
18 kind (including without limitation, photographs, charts, microfiche, microfilm, videotape,  
19 recordings, motion pictures, plans, drawings, surveys), and electronic, mechanical,  
20 magnetic, optical or electric records or representations of any kind (including without  
21 limitation, computer files and programs, tapes, cassettes, discs, recordings), including  
22 Metadata.

23 (h) **“Electronic Media”** means any magnetic, optical, or other storage media device used to  
24 record or access ESI including, without limitation, computer memory, hard disks, floppy  
25 disks, flash memory devices, CDs, DVDs, Blu-ray disks, cloud storage (e.g., DropBox,  
26 Box, OneDrive, and SharePoint), tablet computers (e.g., iPad, Kindle, Nook, and Samsung  
27 Galaxy), cellular or smart phones (e.g., BlackBerry, iPhone, Samsung Galaxy), personal  
28

1 digital assistants, magnetic tapes of all types or any other means for digital storage and/or  
2 transmittal.

- 3 (i) **“ESI” or “Electronically Stored Information”** refers to information and Documents (as  
4 defined within this section) within the full scope of Fed. R. Civ. P. 34 – with all Metadata  
5 intact – created, manipulated, communicated, stored, and best utilized in digital form, and  
6 requiring the use of Electronic Media to access. Such information includes emails, email  
7 attachments, message boards, forums, support tickets, support articles, security alerts,  
8 pop-ups, videos, discussion boards, data, charts, BETA results, error messages, bug  
9 reports, source code, investigative reports, monitoring reports, comments, press releases,  
10 drafts, models, templates, websites, instant messages, chats, and intercompany and intra-  
11 company Communications.
- 12 (j) **“Facebook User(s)”** means Persons who have established a Facebook account.
- 13 (k) **“Identify,” with respect to Documents**, means to give, to the extent known, the (a) type  
14 of Document; (b) general subject matter; (c) date of the Document; (d) author(s), (e)  
15 addressee(s), and (f) recipient(s).
- 16 (l) **“Identify,” with respect to Persons**, means to give, to the extent known, the Person’s full  
17 name, present or last known address, and when referring to a natural person, additionally,  
18 the present or last known place of employment. Once a Person has been identified in  
19 accordance with this subparagraph, only the name of that Person need be listed in  
20 response to subsequent discovery requesting the identification of that Person.
- 21 (m) **“Including”** means “including but not limited to” and “including without limitation.”
- 22 (n) **“Key -> Value Pair”** has the same meaning as described in the following paper: Bronson,  
23 *et al*, *TAO: Facebook’s Distributed Data Store for the Social Graph*, USENIX ATC'13  
24 Proceedings of the 2013 USENIX conference on Annual Technical Conference, § 3.1  
25 (June, 2013) (available at  
26 [https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-](https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-data-store-for-the-social-graph/)  
27 [data-store-for-the-social-graph/](https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-data-store-for-the-social-graph/)).

- 1 (o) **“Metadata”** refers to structured information about an electronic file that is embedded in  
2 the file, describing the characteristics, origins, usage and validity the electronic file.
- 3 (p) **“Object”** has the same meaning as described in the following paper: Bronson, *et al*, *TAO:*  
4 *Facebook’s Distributed Data Store for the Social Graph*, USENIX ATC'13 Proceedings  
5 of the 2013 USENIX conference on Annual Technical Conference, § 3.1 (June, 2013)  
6 (available at [https://research.facebook.com/publications/161988287341248/tao-facebook-](https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-data-store-for-the-social-graph/)  
7 [s-distributed-data-store-for-the-social-graph/](https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-data-store-for-the-social-graph/)).
- 8 (q) **“Object Type”** or **“(otype)”** has the same meaning as described in the following paper:  
9 Bronson, *et al*, *TAO: Facebook’s Distributed Data Store for the Social Graph*, USENIX  
10 ATC'13 Proceedings of the 2013 USENIX conference on Annual Technical Conference, §  
11 3.1 (June, 2013) (available at  
12 [https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-](https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-data-store-for-the-social-graph/)  
13 [data-store-for-the-social-graph/](https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-data-store-for-the-social-graph/)).
- 14 (r) **“Person”** means any natural person or any business, legal or governmental entity or  
15 association.
- 16 (s) **“Plaintiff”** and **“Plaintiffs”** refer to the named plaintiffs in this Action, and any reference  
17 to “Plaintiff” or “Plaintiffs” shall be construed disjunctively or conjunctively as necessary  
18 in order to bring within the scope of the request all responses which otherwise might be  
19 construed to be outside its scope.
- 20 (t) **“Private Message(s)”** means the portion of Facebook’s service designed to transmit  
21 private messages between users – as opposed to posts – and which process is engaged by,  
22 *inter alia*, the “Message” button on users’ profile pages or via the Messenger app.
- 23 (u) **“Process”** refers to a series of discrete steps, ordered and undertaken to achieve a specific  
24 goal or set of goals that facilitate Facebook’s operation.
- 25 (v) **“Relate(s),” “Related to”** or **“Relating to”** shall be construed to mean referring to,  
26 reflecting, concerning, pertaining to or in any manner being connected with the matter  
27 discussed.
- 28

1 (w) **“Source Object”** or **“(id1)”** has the same meaning as described in the following paper:  
2 Bronson, *et al*, *TAO: Facebook’s Distributed Data Store for the Social Graph*, USENIX  
3 ATC'13 Proceedings of the 2013 USENIX conference on Annual Technical Conference, §  
4 3.1 (June, 2013) (available at  
5 [https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-](https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-data-store-for-the-social-graph/)  
6 [data-store-for-the-social-graph/](https://research.facebook.com/publications/161988287341248/tao-facebook-s-distributed-data-store-for-the-social-graph/)).

7 (x) **“Third Party”** refers to any party other than You or Plaintiffs.

8 (y) **“You,” “Your,”** and **“Facebook”** shall mean Facebook, Inc. and any of its directors,  
9 officers, employees, partners, members, representatives, agents (including attorneys,  
10 accountants, consultants, investment advisors or bankers), and any other person purporting  
11 to act on its behalf. In the case of business entities, these defined terms include parents,  
12 subsidiaries, affiliates, predecessor entities, successor entities, divisions, departments,  
13 groups, acquired entities and/or related entities or any other entity acting or purporting to  
14 act on its behalf.

### 15 **RULES OF CONSTRUCTION**

16 1. The connectives “and” and “or” shall be construed either disjunctively or  
17 conjunctively as necessary to bring within the scope of the discovery request all responses that  
18 might otherwise be construed to be outside of its scope.

19 2. “Any,” “all,” and “each” shall be construed as any, all and each.

20 3. The singular form of a noun or pronoun includes the plural form and vice versa.

21 4. The use of any tense of any verb shall also include within its meaning all other  
22 tenses of that verb.

23 5. A term or word defined herein is meant to include both the lower and upper case  
24 reference to such term or word.

25 6. Any headings which appear in the Interrogatories section have been inserted for  
26 the purpose of convenience and ready reference. They do not purport to, and are not intended to,  
27 define, limit, or extend the scope or intent of the Interrogatories to which they pertain.  
28

**INSTRUCTIONS**

1  
2           1.       You are requested to identify all Documents and ESI in Your possession, custody,  
3 or control – as well as Documents and ESI that are in the possession of Your partners, officers,  
4 employees, attorneys, accountants, representatives, or agents, or that are otherwise subject to  
5 Your custody or control – that are described below.

6           2.       Unless otherwise indicated, the Documents and ESI to be identified include  
7 anything prepared, sent, dated or received, or those that otherwise came into existence during the  
8 Relevant Time Period.

9           3.       The identification by one person, party, or entity of a Document or ESI does not  
10 relieve another person, party, or entity from the obligation to identify his, her, or its own copy of  
11 that Document or ESI, even if the two are identical.

12           4.       In identifying Documents and ESI, You are requested to identify a copy of each  
13 original Document or item of ESI together with a copy of all non-identical copies and drafts of  
14 same.

15           5.       Documents and ESI shall be identified as they are kept in the usual course of  
16 business. All Documents and ESI shall be identified with a copy of the file folder, envelope, or  
17 other container in which they are kept or maintained.

18           6.       Documents and ESI not otherwise responsive to this discovery request shall  
19 nonetheless be identified if such Documents and ESI mention, discuss, refer to, or explain the  
20 Documents and ESI which are called for by this discovery request, or if such Documents and ESI  
21 are attached to Documents and ESI called for by this discovery request and constitute routing  
22 slips, transmittal memoranda, or letters, comments, evaluations or similar materials.

23           7.       Each Document and item of ESI requested herein is requested to be identified in  
24 its entirety and without deletion or excisions, regardless of whether You consider the entire  
25 Document or item of ESI to be relevant or responsive to this request.

26           8.       If any Document or ESI called for by these requests is not identified in full on the  
27 ground that it is privileged or otherwise claimed to be protected against production, You are  
28 requested to provide the following information with respect to each such Document or ESI:



- 1 (a) its date;
- 2 (b) its author(s), its signatory(s) and each and every other person who prepared  
3 or participated in its preparation;
- 4 (c) the type of Document or ESI it is (e.g., letter, chart, memorandum, etc.);
- 5 (d) a description of its subject matter and length;
- 6 (e) a list of those persons and entities to whom said Document(s) or ESI was  
7 disseminated, together with their last known addresses and the date or approximate date on which  
8 each such person or entity received it;
- 9 (f) a list of all other persons to whom the contents of the Document or ESI  
10 have been disclosed, the date such disclosure took place, the means of such disclosure, and the  
11 present location of the Document or ESI and all copies thereof;
- 12 (g) each and every person having custody or control of the Document or ESI  
13 and all copies thereof; and
- 14 (h) the nature of the privilege or other rule of law relied upon and any facts  
15 supporting Your position in withholding identification of each such Document or ESI.

16 9. If You assert an objection to any request, You must nonetheless respond and  
17 identify any responsive Documents and ESI that are not subject to the stated objection. If You  
18 object to part of a request or category, You must specify the portion of the request to which You  
19 object, and must produce Documents and ESI responsive to the remaining parts of the request.

20 10. Notwithstanding a claim that a Document or ESI is protected from disclosure, any  
21 Document or ESI so withheld must be identified with the portion claimed to be protected  
22 redacted.

23 11. If any Document or ESI is known to have existed but no longer exists, has been  
24 destroyed, or is otherwise available, You must identify the Document or ESI, the reason for its  
25 loss, destruction or unavailability, the name of each person known or reasonably believed by You  
26 to have present possession, custody, or control of the original and any copy thereof (if  
27 applicable), and a description of the disposition of each copy of the Document or ESI.

28

1           12. Every Interrogatory herein shall be deemed a continuing discovery request, and  
2 You are to supplement information which adds to or is in any way inconsistent with Your initial  
3 answers to these Interrogatories.

4           13. Plaintiffs reserve the right to propound additional Interrogatories.

#### 5   **RELEVANT TIME PERIOD**

6           The relevant time period for each Interrogatory is for September 26, 2006 through the  
7 present (the “Relevant Time Period”), unless otherwise specifically indicated, and shall include  
8 all Documents, ESI, and any other information that relate to such period, even though prepared or  
9 published outside of the relevant time period. If a Document or item of ESI prepared before this  
10 period is necessary for a correct or complete understanding of any Document or item of ESI  
11 covered by a request, You must produce the earlier or subsequent Document or item of ESI as  
12 well. If any Document or item of ESI is undated and the date of its preparation cannot be  
13 determined, the Document or item of ESI shall be produced if otherwise responsive to the  
14 production request.

#### 15   **INTERROGATORIES**

#### 16           **INTERROGATORY NO. 8:**

17           Identify all facts relating to the Processing of each Private Message sent or received by  
18 Plaintiffs containing a URL<sup>1</sup>, including, for each Private Message:

- 19           (A) all Objects that were created during the Processing of the Private Message,  
20 including the (id) and the Object Type for each Object, as well as any Key ->  
21 Value Pair(s) contained in each Object;
- 22           (B) all Objects that were created specifically when the embedded URL was shared,  
23 including the (id) and the Object Type for each Object, as well as any Key ->  
24 Value Pair(s) contained in each Object;
- 25           (C) all Associations related to each Private Message, identified by the Source Object,  
26 Association Type, and Destination Object, as well as any Key -> Value Pair(s)

27 \_\_\_\_\_  
28 <sup>1</sup> Each such Private Message has been identified by each Plaintiff in Exhibit 1 to his respective  
Objections and Responses to Defendant’s First Set of Interrogatories.

- 1 contained in each Association;
- 2 (D) the database names and table names in which each Association and Object is
- 3 stored;
- 4 (E) each application or feature in Facebook that uses the Objects or Associations
- 5 created for each Private Message; and
- 6 (F) how each Object associated with the Private Message was used by Facebook.

7  
8 Dated: May 26, 2015

Respectfully submitted,

9  
10 CARNEY BATES & PULLIAM, PLLC

11 By:           /s/ Hank Bates          

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18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA

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

23 Plaintiffs,

24 v.

25 FACEBOOK, INC.,

26 Defendant.  
27  
28

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Case No. C 13-5996 PJH

**PROOF OF SERVICE BY EMAIL AND  
U.S. MAIL**

1 I am a citizen of the United States and employed in Pulaski County, Arkansas. I am over  
2 the age of eighteen years and not a party to the within-entitled action. My business address is  
3 2800 Cantrell Rd., Suite 510, Little Rock, Arkansas 72202.

4 I am readily familiar with Carney Bates & Pulliam, PLLC's practice for collection and  
5 processing of documents for service via email, and that practice is that the documents are attached  
6 to an email and sent to the recipient's email account.

7 I am also readily familiar with this firm's practice for collection and processing of  
8 correspondence for mailing with the United States Postal Service. Following ordinary business  
9 practices, the envelope was sealed and placed for collection and mailing on this date, and would,  
10 in the ordinary course of business, be deposited with the United States Postal Service on this date.

11 On May 26, 2015, I caused to be served copies of the following documents:

- 12 **1. PLAINTIFFS' SECOND SET OF INTERROGATORIES TO**  
13 **DEFENDANT; and this**
- 14 **2. PROOF OF SERVICE BY EMAIL AND U.S. MAIL**

15 on the following parties in this action through their respective counsel:

16 Christopher Chorba  
17 Gibson, Dunn & Crutcher LLP  
18 333 South Grand Avenue  
19 Los Angeles, CA 90071-3197  
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21 Joshua Aaron Jessen  
22 Gibson Dunn & Crutcher LLP  
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25 Email: jjessen@gibsondunn.com

26 Executed on May 26, 2015, at Little Rock, Arkansas.

27 /s/ David F. Slade  
28 David F. Slade