1   GIBSON, DUNN & CRUTCHER LLP
    JOSHUA A. JESSEN, SBN 222831
2   JJessen@gibsondunn.com
    JEANA BISNAR MAUTE, SBN 290573
3   JBisnarMaute@gibsondunn.com
    ASHLEY M. ROGERS, SBN 286252
4   ARogers@gibsondunn.com
    1881 Page Mill Road
5   Palo Alto, California 94304
    Telephone: (650) 849-5300
6   Facsimile: (650) 849-5333

7   GIBSON, DUNN & CRUTCHER LLP
    GAIL E. LEES, SBN 90363
8   GLees@gibsondunn.com
    CHRISTOPHER CHORBA, SBN 216692
9   CChorba@gibsondunn.com
    333 South Grand Avenue
10 Los Angeles, California 90071
    Telephone: (213) 229-7000
11 Facsimile: (213) 229-7520

12 Attorneys for Defendant
    FACEBOOK, INC.

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14   UNITED STATES DISTRICT COURT

15   NORTHERN DISTRICT OF CALIFORNIA

16   OAKLAND DIVISON

17 MATTHEW CAMPBELL, MICHAEL   Case No. C 13-05996 PJH (MEJ)
    HURLEY, and DAVID SHADPOUR,
18   **PUTATIVE CLASS ACTION**
                Plaintiffs,
19   **DECLARATION OF NIKKI STITT
         v.   SOKOL IN SUPPORT OF DEFENDANT
20   FACEBOOK, INC.'S ADMINISTRATIVE
    FACEBOOK, INC.,   MOTION TO FILE PORTIONS OF THE
21   DECLARATION OF DALE HARRISON
                Defendant.   ON BEHALF OF DEFENDANT
22   FACEBOOK, INC. UNDER SEAL**

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Gibson, Dunn &
Crutcher LLP

DECLARATION OF NIKKI STITT SOKOL IN SUPPORT OF DEFENDANT FACEBOOK, INC.'S ADMINISTRATIVE MOTION
TO FILE PORTIONS OF THE DECLARATION OF DALE HARRISON ON BEHALF OF DEFENDANT FACEBOOK, INC.
UNDER SEAL
Case No. C 13-05996 PJH (MEJ)

I, Nikki Stitt Sokol, declare as follows:

1. I am Associate General Counsel for Litigation for Defendant Facebook, Inc. ("Facebook"). Pursuant to Civil Local Rule 79-5(d) and the Amended Stipulated Protective Order entered by the Court on July 1, 2015 (the "Protective Order") (Dkt. No. 93), I submit this Declaration in support of Plaintiffs' Administrative Motion to file under seal portions of the Declaration of Dale Harrison on Behalf of Defendant Facebook, Inc. ("Harrison Declaration"). Except as otherwise noted, I have personal knowledge of the facts set forth in this Declaration and, if called and sworn as a witness, could and would testify competently to them.

2. The requested relief is necessary to protect the confidentiality of Facebook information in the Harrison Declaration. Specifically, the Harrison Declaration contains non-public, confidential, and proprietary Facebook business information that is privileged, protectable as a trade secret or otherwise entitled to protection under the law.

3. Portions of the Harrison Declaration concern the processes and functionality of Facebook's proprietary messages technology. Public disclosure of this information would cause competitive harm to Facebook by allowing its competitors to access sensitive information, which they could use to gain an unfair advantage against Facebook. Such information could also be used by individuals or companies that might seek to compromise the security of Facebook's messages technology, causing harm to Facebook and users of Facebook's products.

4. For these reasons, the following chart explains which portions of the Harrison Declaration contain the confidential information that should be sealed:

Page	Text
2	Text between "The information I extracted included:" and "…which would be responsive to Plaintiffs' request for information…"
3	Text between "…already produced to Plaintiffs—" and "—are the only Objects created in connection with sharing URLs in messages."
3	Text between "…information I located through my extensive searching—specifically…" and "…for the 16 messages I located."
3	Text between "…that may have been created in connection with these 16 messages" and "Similarly, I am not aware of any automated…"

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Page	Text
3-4	Text between "…billions of pieces of data per day" and "In my experience, developing such functionality…"
4	Text between "…I was required to write new software code using…" and "…to find information about the messages in Facebook's internal system."
4	Text between "I understand that this information, referred to as…" and "…was produced to Plaintiffs."
4	Text between "…I understand that Plaintiffs were unable to provide…" and "Without this data, I could not locate the message."
5	Text between "selected by Plaintiffs." and "Using this process…"
5	Text between "…locate, extract, and provide…" and "…relating to 9 of the 16 messages."
5	Text between "I understand that this information, referred to as…" and "…was produced to Plaintiffs."
5	Text between "7 of the 16 messages did not have a…" and "Using this process, I was able to locate, extract, and provide information…"
5	Text between "…and provide information relating to the 9 URLs in the 9…" and "I understand that this information…"
5	Text between "I understand that this information referred to as…" and "…was produced to Plaintiffs."
5	Text between "At the request of Facebook's counsel, after providing the above information…" and "Using this process, I was able to locate…"
5	Text between "I understand that this information, referred to as…" and "…was produced to Plaintiffs."
6	Text between "This is likely impossible. If ordered to do so…" and "…it could take hundreds of man hours to do so."
6-7	Text between "…that can use the Objects and Associations for each of these messages." and "However, the abstract hypothetical questions to all possible uses…"
7	Text between "The…" and "…documentation that Facebook has already produced…"
7	Text between "…Facebook has already produced to Plaintiffs…" and "This information should help Plaintiffs conduct…"
7	Text between "I understand that Plaintiffs have also asked Facebook to produce…" and "…for the 16 historical messages I extracted."
7	Text between "…for the 16 historical messages I extracted" and "I declare under penalty of perjury…"

5.   Attached hereto as Exhibit A is a true and correct copy of the unredacted version of the Harrison Declaration. The highlighted text in Exhibit A is the text that Facebook requests be redacted for the reasons outlined above.

6.   Attached hereto as Exhibit B is a true and correct copy of the redacted version of the Harrison Declaration, which redacts the information highlighted in Exhibit A.

1   I declare under penalty of perjury under the laws of the United States of America and the

2   State of California that the foregoing is true and correct, and that I executed this Declaration in New

3   York, New York on October 6, 2015.

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                                                   /s/ Nikki Stitt Sokol

5   Nikki Stitt Sokol

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ATTORNEY ATTESTATION

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I, Joshua A. Jessen, attest that concurrence in the filing of this Declaration of Nikki Stitt Sokol

3   has been obtained from the signatory. I declare under penalty of perjury under the laws of the United

4   States of America that the foregoing is true and correct. Executed this 6th day of October, 2015, in

5   Irvine, California.

6

7   Dated: October 6, 2015

/s/ Joshua A. Jessen
Joshua A. Jessen

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