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 FACEBOOK, INC.

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 OAKLAND DIVISION

17 MATTHEW CAMPBELL, MICHAEL
 HURLEY, and DAVID SHADPOUR,
 18
 Plaintiffs,
 19
 v.
 20 FACEBOOK, INC.,
 21
 Defendant.
 22

Case No. C 13-05996 PJH (MEJ)

PUTATIVE CLASS ACTION

**DECLARATION OF DALE HARRISON
 ON BEHALF OF DEFENDANT
 FACEBOOK, INC.**

1 I, Dale Harrison, declare as follows:

2 1. I have been employed as a software engineer at Facebook since August 2014, and my
3 current title is Engineering Manager. I am over the age of 18. In connection with the above-
4 captioned case, I conducted a search for and extraction of certain data, as described further below,
5 and provided the extracted data to Facebook’s counsel, who I understand produced that data to the
6 Plaintiffs in this case. I submit this declaration in response to the Court’s Minute Entry following the
7 Telephonic Discovery Hearing on September 29, 2015 (Dkt. 118). Specifically, this declaration
8 explains the time-consuming processes I undertook to gather the data already provided to Plaintiffs,
9 as well as the amount of additional time and burden it would take to attempt to gather the additional
10 data that I understand Plaintiffs are requesting (assuming that it were possible to gather that
11 additional data, which it likely is not, and certainly not without significant additional work, for the
12 reasons described below). Unless otherwise stated, the following facts are within my personal
13 knowledge and, if called and sworn as a witness, I could and would testify competently to these facts.

14 **Plaintiffs’ Requests for Information**

15 2. I understand that Plaintiffs in this case asked Facebook to identify:

- 16 • A list of all the Objects and Associations created during the process of sending a given
17 Message
18 • All associated objects, including id, object type, and key/value pair (including for any
19 URLs shared in the message); associations with source object association type,
20 destination object, and key/value pair; database name and tables storing each
21 association and object; each application or feature using each object or association;
22 and how those objects are used by Facebook.
23 • For each object, identification and production of the Object’s attributes.

24 3. I understand that Plaintiffs seek the above information related to 19 specific messages
25 that Plaintiffs had sent or received. I further understand that Plaintiffs have represented that each of
26 those 19 messages contained a Uniform Resource Locator (“URL”)—*i.e.*, a link to a website.

1 **Summary of Search Results and Burden**

2 4. In connection with Plaintiffs' requests, I was provided with information about 19
3 messages that Plaintiffs sent or received. The information included the message senders, recipients,
4 dates and times, and URLs contained in the messages. As explained in greater detail below,
5 searching for these messages and extracting the relevant data was a time-consuming and labor-
6 intensive process, and despite my extensive efforts, I was unable to locate 3 of the messages at all.

7 5. For the 16 messages I did locate, I was able to extract several pieces of information
8 relating to those messages. The information I extracted included:

- 9 a. [REDACTED]
10 [REDACTED]
- 11 b. [REDACTED]
12 [REDACTED]
- 13 c. [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
- 17 d. [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]

21 6. [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED], which
25 would be responsive to Plaintiffs' request for information about each application or feature using
26 each object or association, and how those objects are used by Facebook.
27
28

1 7. The Objects identified, extracted, and already produced to Plaintiffs—[REDACTED]
2 [REDACTED]—are the
3 only Objects created in connection with sharing URLs in messages.

4 8. Nonetheless, I understand that Facebook has provided to Plaintiffs the additional
5 information I located through my extensive searching—specifically, [REDACTED]
6 [REDACTED] for the 16 messages I located.

7 9. There is no automated or otherwise reasonable way to go beyond that and identify and
8 gather information about any additional Objects and Associations (if any) that may have been created
9 in connection with these 16 messages. [REDACTED]

10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]. Similarly, I am not aware of any automated or otherwise
15 reasonable mechanism for identifying other specific applications or uses of any other potential
16 Objects and Associations. I also have inquired with others within Facebook who would know, and
17 they were unable to identify any automated or reasonable mechanism for locating this information.

18 **Background on Objects, Associations, and Searchability**

19 10. I first wish to provide the Court with some background on Facebook and the relevant
20 vocabulary here. Facebook is the world’s largest social network and has over 1 billion monthly
21 active users worldwide. Given its size, Facebook’s software processes billions of actions per day,
22 which involves processing and storing, in one way or another, billions of pieces of data per day. [REDACTED]

23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 11. [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 12. [REDACTED]

10 [REDACTED]

11 [REDACTED] In my experience, developing such
12 functionality would likely be impossible, and at a minimum it would require hundreds of hours of
13 engineering time.

14 **Procedure for Extracting the Produced Material**

15 13. In order to locate and extract the above data for these messages, I was required to
16 write new software code using [REDACTED]
17 [REDACTED] to find information about the messages in Facebook’s internal system. Where successful,
18 the results of each search returned information for each message, stored in Facebook’s systems. This
19 was a message-by-message exercise. Using this process, I was able to locate, extract, and provide
20 information relating to 16 of the 19 messages. I understand that this information, referred to as
21 [REDACTED] was produced to Plaintiffs.

22 14. As noted above, despite my best efforts, I was unable to locate 3 of the 19 messages.
23 There are a number of possible reasons for this. For example, for one of the messages, I understand
24 that Plaintiffs were unable to provide [REDACTED]
25 [REDACTED]

26 Without this data, I could not locate the message. It is also possible that Plaintiffs may have deleted
27 certain messages (though I am informed that Plaintiffs represented this was not the case). At any
28

1 rate, as a result of the new code I wrote, I was able to locate information for 16 of the 19 messages
2 selected by Plaintiffs.

3 15. [REDACTED]

4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED] Using this process, I was able to locate, extract, and provide
10 [REDACTED] relating to 9 of the 16 messages. I understand that this information, referred
11 to as [REDACTED] was produced to Plaintiffs. 7 of the 16 messages did not have a [REDACTED]

12 16. [REDACTED]

13 [REDACTED]
14 [REDACTED]
15 [REDACTED]. Using this process, I was able to locate, extract, and provide information
16 relating to the 9 URLs in the 9 [REDACTED]. I understand that this information, referred to as
17 [REDACTED] was produced to Plaintiffs.

18 17. At the request of Facebook's counsel, after providing the above information, [REDACTED]

19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED] Using this process, I was able to locate, extract, and provide additional information relating
26 to 16 of the 19 messages. I understand that this information, referred to as [REDACTED] was
27 produced to Plaintiffs.
28

1 18. In total, working with counsel over the course of August and September, I estimate
2 that I spent more than 25 hours writing new code and conducting the manual searches and extractions
3 outlined above.

4 **Estimated Burden for Identifying and Producing Additional Objects and Associations**

5 19. I understand that Plaintiffs also seek *all* other Objects related to each of the 16
6 messages that I was able to identify. This is likely impossible. If ordered to do so, [REDACTED]

7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]

21 [REDACTED], it could take hundreds of man hours to do so.
22 Depending on how many objects there are, it could take a much longer period of time.

23 **Identifying Applications or Features or other Use of Objects and Associations**

24 20. I understand that Plaintiffs also asked Facebook to identify each application or feature
25 in Facebook that can use the Objects and Associations for each of these messages. [REDACTED]

26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

1 **ATTORNEY ATTESTATION**

2 I, Joshua A. Jessen, attest that concurrence in the filing of this Declaration of Dale Harrison
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