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

18 MATTHEW CAMPBELL and MICHAEL  
19 HURLEY, on behalf of themselves and all  
others similarly situated,

20 Plaintiff,

21 v.

22 FACEBOOK, INC.,

23 Defendant.

Case No. C 13-05996 PJH (MEJ)

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL RE  
PLAINTIFFS' RESPONSE TO  
DECLARATION OF DALE HARRISON**

Judge: Honorable Maria-Elena James

25 Having considered Plaintiffs' administrative motion to file under seal pursuant to Civil  
26 Local Rule 79-5, which was filed on October 8, 2015, as well as Plaintiffs' supporting  
27 declaration, and all other papers and pleadings on file, the Court hereby grants the motion to seal  
28 the following documents: (1) Exhibits 1 and 2 to Plaintiffs' Response to the Declaration of Dale

1 Harrison (“Response”); and (2) such portions of the Response as are designated in the table  
 2 below:

Page	Text
1	Between “...asserts that only the” and “concerning the incremental increase...”
1	Between “The” and “Plaintiffs seek are essential...”
1	Between “...limit its production to the” and “associated with the Like counter.”
1	Between “...basis for why other” and “beyond those concerning incrementing the Like counter...”
2-3	Between “Facebook’s declarant states that it” and “Declaration at ¶ 19.”
3	Between “Mr. Harrison further states that he” and “Id. Put another way”
3	Between “...he cannot identify or produce...” and “This is simply a restatement...”
3	Between “...his statements are always conditional:” and “Declaration at ¶ 19.”
3	Between “...and the purportedly” and “Plaintiffs are not asking...”
3-4	Between “The Declaration does not” and “Facebook nonetheless...”
4	Between “Further, Facebook’s methodology in identifying” and “Id. at ¶ 19.”
4	Between “... Mr. Harrison does not say that” and “Id. at ¶ 18.”
4	Between “identify and produce” and “In contrast to...”
5	Between “Plaintiffs are entitled to receive the following items of information:” and “Each of the above-described documents...”
5-6	Between “Each of these documents contains content related to how...” and “In response,....”
6	Between “In response, Facebook contends that ” and “As Plaintiffs seek injunctive relief...”
6	Between “depth and breadth of” and “Moreover,....”
6	Between “Moreover,” and “If other documents purport...”
6	Between “...clear that the content of ...” and “Refusal to produce...”

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Page	Text
7	Between "...should be produced" and "...created from private messages."
7	Between "In terms of identifying how" and " <i>Id.</i> at ¶ 20."
7	Between "...purpose of each" and "thus far produced."
7	Between "...allow Plaintiffs to" and " <i>Id.</i> at ¶ 6."
7	Between "Identification of" and "The Declaration makes reference to..."
7-8	Between "The Declaration makes reference to" and "Such clarification..."
7	Between "...burden from identifying" and "it should be compelled..."
3, fn 1	Between "Harrison states that it would be" and the end of the footnote.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
MARIA-ELENA JAMES  
United States Magistrate Judge