

# **EXHIBIT 1**

## Jessen, Joshua A.

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**From:** Rudolph, David T. <drudolph@lchb.com>  
**Sent:** Thursday, October 08, 2015 2:30 PM  
**To:** Maute, Jeana Bisnar; Jessen, Joshua A.; Chorba, Christopher; Rogers, Ashley; Rajagopalan, Priyanka  
**Cc:** Sobol, Michael W.; Diamand, Nicholas; Gardner, Melissa; 'dslade@cbplaw.com'; 'Allen Carney (acarney@cbplaw.com) (acarney@cbplaw.com)'; 'hbates@cbplaw.com'  
**Subject:** RE: Campbell v. Facebook

Jeana,

Thank you for your email. Please produce all copies of the document.

Thanks.

**Lieff  
Cabraser  
Heimann &  
Bernstein**  
Attorneys at Law

**David T. Rudolph**  
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**From:** Maute, Jeana Bisnar [mailto:jbisnarmaute@gibsondunn.com]  
**Sent:** Wednesday, October 07, 2015 11:02 PM  
**To:** Rudolph, David T.; Jessen, Joshua A.; Chorba, Christopher; Rogers, Ashley; Rajagopalan, Priyanka  
**Cc:** Sobol, Michael W.; Diamand, Nicholas; Gardner, Melissa; 'dslade@cbplaw.com'; 'Allen Carney (acarney@cbplaw.com) (acarney@cbplaw.com)'; 'hbates@cbplaw.com'  
**Subject:** RE: Campbell v. Facebook

David, as I noted in my email last week, we have identified a set of documents that contain a number of very close (but not exact) duplicates. Specifically, we have identified several hundred versions of an email that is duplicative of a document we have already produced to Plaintiffs; the only difference among the versions is that they reflect approximately 900 different recipients. Consistent with our previous practice in this case, we planned to produce all copies of this email message, since they are not exact duplicates. But Plaintiffs recently complained about receiving near-duplicate documents. Given these complaints, one alternative is that we can provide a list of all recipients of this document, along with an additional copy. We will plan to proceed in that fashion unless you want all duplicate copies. Please let us know by close of business tomorrow. If we do not hear from you by then, we will produce a list of all recipients along with a single copy of the document.

Thanks,

**Jeana Bisnar Maute**

**GIBSON DUNN**

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**From:** Maute, Jeana Bisnar  
**Sent:** Wednesday, October 07, 2015 10:07 AM  
**To:** 'Rudolph, David T.'; Jessen, Joshua A.; Chorba, Christopher; Rogers, Ashley; Rajagopalan, Priyanka  
**Cc:** Sobol, Michael W.; Diamand, Nicholas; Gardner, Melissa; 'dslade@cbplaw.com'; 'Allen Carney ([acarney@cbplaw.com](mailto:acarney@cbplaw.com)) ([acarney@cbplaw.com](mailto:acarney@cbplaw.com))'; 'hbates@cbplaw.com'  
**Subject:** RE: Campbell v. Facebook

Hi David. My email speaks for itself, and we reject your attempt to misstate it.

Thanks,

**Jeana Bisnar Maute**

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**From:** Rudolph, David T. [<mailto:drudolph@lchb.com>]  
**Sent:** Monday, October 05, 2015 4:24 PM  
**To:** Maute, Jeana Bisnar; Jessen, Joshua A.; Chorba, Christopher; Rogers, Ashley; Rajagopalan, Priyanka  
**Cc:** Sobol, Michael W.; Diamand, Nicholas; Gardner, Melissa; 'dslade@cbplaw.com'; 'Allen Carney ([acarney@cbplaw.com](mailto:acarney@cbplaw.com)) ([acarney@cbplaw.com](mailto:acarney@cbplaw.com))'; 'hbates@cbplaw.com'  
**Subject:** RE: Campbell v. Facebook

Jeana,

Thank you for your email informing us that Facebook was unable to substantially complete its production by September 30. As Facebook based its opposition to our motion to extend in part on the representation it would do so, we reserve the right to call the delinquent production to the Court's attention, as circumstances may warrant.

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**From:** Maute, Jeana Bisnar [<mailto:jbisnarmaute@gibsondunn.com>]  
**Sent:** Friday, October 02, 2015 3:47 PM  
**To:** Rudolph, David T.; Jessen, Joshua A.; Chorba, Christopher; Rogers, Ashley; Rajagopalan, Priyanka  
**Cc:** Sobol, Michael W.; Diamand, Nicholas; Gardner, Melissa; 'dslade@cbplaw.com'; 'Allen Carney ([acarney@cbplaw.com](mailto:acarney@cbplaw.com)) ([acarney@cbplaw.com](mailto:acarney@cbplaw.com))'; 'hbates@cbplaw.com'  
**Subject:** RE: Campbell v. Facebook

Thank you for your email, David. In our view, Facebook's production is substantially complete. We anticipate making one additional production by the end of next week. We are still working through a set of documents, many of which are very close (but not exact) duplicates, and therefore the production next week will likely be larger in volume than in substance, but we have not yet completed that review. And, of course, if we become aware of additional relevant, non-privileged documents, we will produce them.

Thanks,  
Jeana Bisnar Maute

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**From:** Rudolph, David T. [<mailto:drudolph@lchb.com>]  
**Sent:** Thursday, October 01, 2015 1:46 PM  
**To:** Jessen, Joshua A.; Chorba, Christopher; Maute, Jeana Bisnar; Rogers, Ashley; Rajagopalan, Priyanka  
**Cc:** Sobol, Michael W.; Diamand, Nicholas; Gardner, Melissa; 'dslade@cbplaw.com'; 'Allen Carney ([acarney@cbplaw.com](mailto:acarney@cbplaw.com))' ([acarney@cbplaw.com](mailto:acarney@cbplaw.com)); 'hbates@cbplaw.com'  
**Subject:** Campbell v. Facebook

Counsel,

In Facebook's opposition to Plaintiffs' motion for an extension of the briefing deadlines, you represented to the Court that Facebook expected to substantially complete its production by September 30. Yesterday (September 30) we did not receive any further document production from Facebook. On September 29, we received a production of approximately 150 documents (a large proportion of which appears to be a small number of documents produced in multiple duplicates).

Please confirm whether Facebook's position is that its document production is substantially complete. If not, please provide us a date certain when the production will be substantially complete.

Thank you.

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