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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

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

Plaintiffs,

v.

FACEBOOK, INC.,

Defendant.

First Filed Case: No. C 13-05996 PJH
Related Case: No. C 14-00307 PSG

CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER TO RELATE CASES**

The Honorable Phyllis J. Hamilton

1 WHEREAS, on December 30, 2013, plaintiffs Matthew Campbell and Michael Hurley
2 initiated this putative class action against Facebook, Inc. (“Facebook”), alleging violations of federal
3 and state law in connection with the purported scanning of URLs in private messages between
4 Facebook users (the “Campbell Action”);

5 WHEREAS, on January 21, 2014, plaintiff David Shadpour filed a separate putative class
6 action in this District against Facebook predicated on substantially similar facts and substantive
7 allegations, and asserting the same state law claims as the Campbell Complaint, captioned *Shadpour*
8 *v. Facebook, Inc.*, Case No. 5:14-00307-PSG (the “Shadpour Action”); and

9 WHEREAS, the undersigned parties agree that the Campbell Action and Shadpour Action are
10 related pursuant to Civil Local Rule 3-12(a) because “(1) [t]he actions concern substantially the same
11 parties, property, transaction, or event; and (2) [i]t appears likely that there will be an unduly
12 burdensome duplication of labor and expense or conflicting results if the cases are conducted before
13 different Judges.”

14 NOW, THEREFORE, pursuant to Civil Local Rules 3-12 and 7-12, and subject to the
15 approval of the Court, the parties hereby stipulate that the Campbell Action and Shadpour Action are
16 related and request that the Court enter an order reassigning the second-filed Shadpour Action to the
17 Honorable Phyllis J. Hamilton, who is overseeing the first-filed Campbell Action.

18 Respectfully submitted,

19 DATED: January 29, 2014

20 GIBSON, DUNN & CRUTCHER LLP

21 By: _____ /s/
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Attorneys for Defendant FACEBOOK, INC.

DATED: January 29, 2014

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MICHAEL HURLEY

[PROPOSED] ORDER

Having considered the parties' Stipulation, and good cause appearing, the Court hereby GRANTS the parties' Stipulation. The Campbell Action and Shadpour Action are related under Civil Local Rule 3-12(a), and the Shadpour Action therefore is reassigned to this Court pursuant to Civil Local Rule 3-12(f).

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

The Honorable Phyllis J. Hamilton
United States District Court Judge

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