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12 Attorneys for Defendant  
 FACEBOOK, INC.

13  
 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.

Case No. C 13-05996 PJH (MEJ)

**PUTATIVE CLASS ACTION**

**DECLARATION OF NIKKI STITT  
 SOKOL IN SUPPORT OF PLAINTIFFS’  
 ADMINISTRATIVE MOTION TO FILE  
 DOCUMENTS UNDER SEAL – DKT. NO.  
 137**

1 I, Nikki Stitt Sokol, declare as follows:

2 1. I am Associate General Counsel for Litigation for Defendant Facebook, Inc.  
3 (“Facebook”). Pursuant to Civil Local Rule 79-5(d) and the Amended Stipulated Protective Order  
4 entered by the Court on July 1, 2015 (the “Protective Order”) (Dkt. No. 93), I submit this Declaration  
5 in support of Plaintiffs’ Administrative Motion to File Under Seal re Plaintiffs’ Motion for Class  
6 Certification and Supporting Documents (Dkt. No. 137), which seeks to file under seal (1) designated  
7 portions of Plaintiffs’ Motion for Class Certification (Dkt. No. 138); (2) designated portions of the  
8 Expert Report of Jennifer Golbeck in support of Plaintiffs’ Motion for Class Certification (“Golbeck  
9 Report”), which is Exhibit 2 to the Declaration of Melissa Gardner in support of Plaintiffs’ Motion  
10 for Class Certification (“Gardner Cert. Declaration”); (3) designated portions of the Expert Report of  
11 Fernando Torres in support of Plaintiffs’ Motion for Class Certification (“Torres Report”), which is  
12 Exhibit 33 to the Gardner Cert. Declaration; (4) designated portions of Facebook’s Supplemental  
13 Responses and Objections to Plaintiffs’ Narrowed Second Set of Interrogatories (“Facebook’s  
14 Supplemental Discovery Responses”), which is Exhibit 20 to the Gardner Cert. Declaration; and (5)  
15 Exhibits 3-18, 27-30, and 34-35 to the Gardner Cert. Declaration, in their entirety. Except as  
16 otherwise noted, I have personal knowledge of the facts set forth in this Declaration and, if called and  
17 sworn as a witness, could and would testify competently to them.

18 2. Facebook respectfully requests that the Court allow the below-referenced documents  
19 (or relevant portions of those documents) to be filed under seal due to their confidential nature. As  
20 discussed below, the documents constitute, reflect, contain, or discuss confidential information that is  
21 protectable as a trade secret or otherwise entitled to protection under the law. I respectfully submit  
22 that the presumption of access to judicial records does not apply here because the documents at issue  
23 are being filed in connection with a non-dispositive motion (*see In re Midland Nat’l Life Ins. Co.*  
24 *Annuity Sales Practices Litig.*, 686 F.3d 1115, 1119 (9th Cir. 2012)<sup>1</sup>), and therefore the appropriate  
25

26 <sup>1</sup> See also *In re High-Tech Employee Antitrust Litig.*, No. 11-CV-02509, 2013 U.S. Dist. LEXIS  
27 6606, at \*8 (N.D. Cal. Jan. 15, 2013) (“Plaintiffs’ Motion for Class Certification is a  
28 nondispositive motion. Therefore, the parties need only demonstrate ‘good cause’ in order to

Footnote continued on next page

1 legal standard is “good cause,” which Facebook respectfully submits is satisfied. *See Kamakana v.*  
 2 *City and County of Honolulu*, 447 F.3d 1172, 1180 (9th Cir. 2006) (“A ‘good cause’ showing will  
 3 suffice to seal documents produced in discovery. Fed.R.Civ.P.26(c) (stating that if ‘good cause’ is  
 4 shown in discovery, a district court may issue ‘any order which justice requires to protect a party or  
 5 person from annoyance, embarrassment, oppression, or undue burden or expense’).”). For the benefit  
 6 of the Court, to the extent possible I discuss the documents by category.

7 **Plaintiffs’ Motion for Class Certification**

8 3. Good cause exists to seal portions of Plaintiffs’ Motion for Class Certification.  
 9 Specifically, the following portions contain non-public, confidential, and proprietary Facebook  
 10 business information that Facebook designated as HIGHLY CONFIDENTIAL – ATTORNEYS’  
 11 EYES ONLY pursuant to the Protective Order. The public does not have a meaningful interest in  
 12 obtaining such information, and public disclosure of this information would cause particularized  
 13 harm to Facebook by allowing its competitors to access sensitive information, which they could use  
 14 to gain an unfair advantage against Facebook. Such information could also be used by individuals or  
 15 companies that might seek to compromise the security of Facebook’s messages technology, causing  
 16 harm to Facebook and the people who use Facebook’s services:

Sealable Portions	Reason for Confidentiality
ii:8-9	This information concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
1:12-13	This information concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
1:13-15	This information concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
1:16-17	The information redacted by Plaintiffs does not need to be sealed.
1:18-19	This information concerns the internal processes and functionality of

25 Footnote continued from previous page

26 support their requests to seal.”); *In re NCAA Student-Athlete Name & Likeness Licensing Litig.*,  
 27 No. 09-cv-01967, 2013 U.S. Dist. LEXIS 85375, at \*11 (N.D. Cal. June 17, 2013) (“Courts in  
 28 this district have generally considered motions for class certification nondispositive.”).

Sealable Portions	Reason for Confidentiality
	Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
2:2-3	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
2:5-6	The information redacted by Plaintiffs is from the Declaration of Dale Harrison on Behalf of Defendant Facebook, Inc. ("Harrison Declaration") and does not need to be sealed, per the Magistrate Judge's previous order regarding the parties' Administrative Motions to Seal (Dkt. No. 131).
2:8-10	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
3:11-12	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
3:17-18	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
4:8-9	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
4:9-14	Only the text following "Once a URL has been detected" needs to be sealed.  The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law
4:15-22	Only the text following "Facebook detects" needs to be sealed.  The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
5:1-3	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
5:3-6	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
5:6-8	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
5:10-12	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
5:12-14	The information redacted by Plaintiffs does not need to be sealed.
5:14-15	Only the text between "did not need to" and "to process or send the

Sealable Portions	Reason for Confidentiality
	message, and” needs to be sealed.  The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
5:15-16	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
5:18	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 14 at 5:27-28	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
6:4-6	The information redacted by Plaintiffs is from the Harrison Declaration and does not need to be sealed, per the Court’s previous order regarding the parties’ Administrative Motions to Seal (Dkt. No. 131).
6:6-9	The information redacted by Plaintiffs is from the Harrison Declaration and does not need to be sealed, per the Court’s previous order regarding the parties’ Administrative Motions to Seal (Dkt. No. 131).
6:10-12	The information redacted by Plaintiffs is from the Harrison Declaration and does not need to be sealed, per the Court’s previous order regarding the parties’ Administrative Motions to Seal (Dkt. No. 131).
6:20-21	The information redacted by Plaintiffs is the deposition testimony of a Facebook employee and concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
7:1-2	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
7:3-4	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
7:4-14	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
7:15-16	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
7:19-21	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
7:22	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 22 at 7:23-24	The information redacted by Plaintiffs concerns the internal processes and

Sealable Portions	Reason for Confidentiality
	functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law. .
fn. 23 at 7:24-25	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 23 at 7:25-26	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 24 at 7:26-28	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
8:1-9	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
8:9-10	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
8:14	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
8:16-17	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
8:21-23	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 26 at 8:24	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 26 at 8:24-25	The information redacted by Plaintiffs is the deposition testimony of a Facebook employee and concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
9:4-7	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
9:10	The information redacted by Plaintiffs does not need to be sealed.
9:10-11	The information redacted by Plaintiffs does not need to be sealed.
9:12-13	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
9:15-16	The information redacted by Plaintiffs is a Facebook internal discussion of business and engineering decisions regarding Facebook’s technology that is entitled to protection under the law.
fn. 31 at 9:17-18	The information redacted by Plaintiffs is a Facebook internal discussion of business and engineering decisions regarding Facebook’s technology that

Sealable Portions	Reason for Confidentiality
	is entitled to protection under the law.
fn. 31 at 9:19	The information redacted by Plaintiffs does not need to be sealed, per the Court's previous order regarding the parties' Administrative Motions to Seal (Dkt. No. 131).
fn. 31 at 9:19-20	The information redacted by Plaintiffs is a Facebook internal discussion of business and engineering decisions regarding Facebook's technology that is entitled to protection under the law.
fn. 32 at 9:21-23	The information redacted by Plaintiffs is a Facebook internal discussion of business and engineering decisions regarding Facebook's technology that is entitled to protection under the law.
fn. 33 at 9:24-25	The information redacted by Plaintiffs concerns Facebook's internal documentation of the technical aspects of Facebook's targeted advertising functionality that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 37 at 9:28-10:21	The information redacted by Plaintiffs is a Facebook internal discussion of business and engineering decisions regarding Facebook's technology that is entitled to protection under the law.
10:2	The information redacted by Plaintiffs is a Facebook internal discussion of business and engineering decisions regarding Facebook's technology that is entitled to protection under the law.
10:3-5	The information redacted by Plaintiffs is a Facebook internal discussion of business and engineering decisions regarding Facebook's technology that is entitled to protection under the law.
10:6	The information redacted by Plaintiffs is a Facebook internal discussion of business and engineering decisions regarding Facebook's technology that is entitled to protection under the law.
10:7	The information redacted by Plaintiffs does not need to be sealed.
10:8	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
10:9-10	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
10:10-11	The information redacted by Plaintiffs does not need to be sealed.
fn. 38 at 10:21-24	The information redacted by Plaintiffs is a Facebook internal discussion of business and engineering decisions regarding Facebook's technology that is entitled to protection under the law.
fn. 40 at 10:26-27	The information redacted by Plaintiffs is a Facebook internal discussion of business and engineering decisions regarding Facebook's technology that is entitled to protection under the law.
11:17	The information redacted by Plaintiffs is a Facebook internal discussion of business and engineering decisions regarding Facebook's technology that is entitled to protection under the law.
fn. 43 at 11:25-26	The information redacted by Plaintiffs is a Facebook internal discussion of business and engineering decisions regarding Facebook's technology that is entitled to protection under the law.

<b>Sealable Portions</b>	<b>Reason for Confidentiality</b>
13:20	The information redacted by Plaintiffs does not need to be sealed.
15:7	The information redacted by Plaintiffs does not need to be sealed.
15:9	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 48 at 15:24	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 48 at 15:25-26	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 48 at 15:27	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 49 at 15:27-28	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
17:3	The information redacted by Plaintiffs does not need to be sealed.
17:5-6	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
17:15	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 51 at 17:25-26	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 52 at 17:26-28	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
19:23-24	The information redacted by Plaintiffs is the deposition testimony of a Facebook employee and concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
20:13-16	The information redacted by Plaintiffs is a Facebook internal discussion of business and engineering decisions regarding Facebook's technology that is entitled to protection under the law.
20:17-19	The information redacted by Plaintiffs is a Facebook internal discussion of business and engineering decisions regarding Facebook's technology that is entitled to protection under the law.
20:20-22	The information redacted by Plaintiffs is a Facebook internal discussion of business and engineering decisions regarding Facebook's technology that is entitled to protection under the law.
20:23-25	The information redacted by Plaintiffs is a Facebook internal discussion of business and engineering decisions regarding Facebook's technology that is entitled to protection under the law.



<b>Sealable Portions</b>	<b>Reason for Confidentiality</b>
fn. 57 at 23:20-22	The information redacted by Plaintiffs is a Facebook internal discussion of business and engineering decisions regarding Facebook's technology that is entitled to protection under the law.
fn. 57 at 23:22-23	The information redacted by Plaintiffs does not need to be sealed.
fn. 57 at 23:23	The information redacted by Plaintiffs is a Facebook internal discussion of business and engineering decisions regarding Facebook's technology that is entitled to protection under the law.
fn. 57 at 23:23-25	The information redacted by Plaintiffs is a Facebook internal discussion of business and engineering decisions regarding Facebook's technology that is entitled to protection under the law.

**The Golbeck Report**

4. Good cause exists to seal portions of the Golbeck Report. Specifically, the following portions contain non-public, confidential, and proprietary Facebook business information that Facebook designated as HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY or HIGHLY CONFIDENTIAL – SOURCE CODE pursuant to the Protective Order. The public does not have a meaningful interest in obtaining such information, and public disclosure of this information would cause particularized 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 the people who use Facebook’s services.

<b>Sealable Portions</b>	<b>Reason for Confidentiality</b>
i:8	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
i:10-11	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
i:12	The information redacted by Plaintiffs does not need to be sealed.
i:13-14	The information redacted by Plaintiffs does not need to be sealed.
i:15	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
4:19-21	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
5:7-18	The information redacted by Plaintiffs does not need to be sealed.
5:20-21	The information redacted by Plaintiffs concerns the internal processes and functionality of Facebook’s messages technology that is protectable

Sealable Portions	Reason for Confidentiality
	as a trade secret or otherwise entitled to protection under the law.
5:23-6:2	This information redacted by Plaintiffs contains portions of Facebook's Supplemental Responses and Objections to Plaintiffs' First Set of Interrogatories, and there is good cause for this information to be sealed, per the Court's previous order regarding the parties' Administrative Motions to Seal (Dkt. No. 131). The referenced portion of Facebook's discovery responses concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
6:10-13	The information redacted by Plaintiffs testimony is deposition testimony of a Facebook employee and concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
6:14-24	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
7:1-5	The information redacted by Plaintiffs does not need to be sealed.
7:6-8	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
7:9-16	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
7:18-19	The information redacted by Plaintiffs does not need to be sealed.
fn. 10 at 7:26	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
8:1-12	The information redacted by Plaintiffs does not need to be sealed.
8:14-15	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
8:15-17	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law. This information also contains portions of Facebook's Supplemental Responses and Objections to Plaintiffs' First Set of Interrogatories, and there is good cause for this information to be sealed, per the Court's previous order regarding the parties' Administrative Motions to Seal (Dkt. No. 131). The referenced portion of Facebook's discovery responses concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
8:18-20	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
8:21-22	The information redacted by Plaintiffs concerns the processes and

Sealable Portions	Reason for Confidentiality
	functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
8:24	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
8:25	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
9:3-12	The information redacted by Plaintiffs testimony is deposition testimony of a Facebook employee and concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
9:13-14	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
9:14-15	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
9:16	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
9:24-25	The information redacted by Plaintiffs does not need to be sealed.
9:25	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
9:25-10:1	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 15 at 9:26-27	The information redacted by Plaintiffs testimony is deposition testimony of a Facebook employee and concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
10:1-2	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
10:2-3	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
10:5-6	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
10:07	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
10:7-8	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade

Sealable Portions	Reason for Confidentiality
	secret or otherwise entitled to protection under the law.
10:8	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
10:8-12	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
10:13-26	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
11:1-12	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
11:14	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
11:14-15	The information redacted by Plaintiffs does not need to be sealed.
11:19	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
11:20	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
11:21-22	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 19 at 11:25-26	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 19 at 11:26	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 19 at 11:27-28	The information redacted by Plaintiffs contains portions of Facebook's Second Supplemental Responses and Objections to Plaintiffs' Narrowed Second Set of Interrogatories. The referenced portion of Facebook's discovery responses concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
12:1-2	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
12:3	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
12:5-7	The information redacted by Plaintiffs concerns the processes and

Sealable Portions	Reason for Confidentiality
	functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
12:9-10	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
12:12	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
12:13-15	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
12:16	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
12:18-19	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
12:20-22	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
12:22-23	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
12:23-25	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
12:26-27	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 22 at 12:28	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
13:1	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
13:2	The information redacted by Plaintiffs concerns Facebook’s internal documentation of the processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
13:3-4	The information redacted by Plaintiffs is deposition testimony of a Facebook employee and concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
13:5	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook’s messages

Sealable Portions	Reason for Confidentiality
	technology that is protectable as a trade secret or otherwise entitled to protection under the law.
13:6-8	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
13:9	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
13:9-11	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
13:11-13	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
13:14	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
13:15	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
13:16-18	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
13:19-21	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
13:22-23	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
14:1	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
14:1-2	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
14:03	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
14:04	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.

<b>Sealable Portions</b>	<b>Reason for Confidentiality</b>
14:05	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
14:6-9	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
14:10-11	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
14:12-14	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
14:19-21	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
14:22	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
14:23-28	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
15:1	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
15:2-7	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
15:8-11	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
15:13-14	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
15:15-18	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
15:19-20	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
15:21-25	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
15:26-27	The information redacted by Plaintiffs concerns the processes and

Sealable Portions	Reason for Confidentiality
	functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
16:1-5	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
16:6-9	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
16:10-14	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
16:15-16	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
16:17-19	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
16:20-21	The information redacted by Plaintiffs testimony is deposition testimony of a Facebook employee and concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
16:22-27	The information redacted by Plaintiffs testimony is deposition testimony of a Facebook employee and concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
17:1-3	The information redacted by Plaintiffs testimony is deposition testimony of a Facebook employee and concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
17:5	The information redacted by Plaintiffs testimony is deposition testimony of a Facebook employee and concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
17:5-6	The information redacted by Plaintiffs testimony is deposition testimony of a Facebook employee and concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
17:6-11	The information redacted by Plaintiffs testimony is deposition testimony of a Facebook employee and concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
17:12-14	The information redacted by Plaintiffs does not need to be sealed.
17:15-18	The information redacted by Plaintiffs concerns Facebook’s internal documentation of the processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.



<b>Sealable Portions</b>	<b>Reason for Confidentiality</b>
18:1-11	The information redacted by Plaintiffs concerns Facebook's internal documentation of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
18:13-17	The information redacted by Plaintiffs concerns Facebook's internal documentation of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
18:18-22	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
18:23-19:7	The information redacted by Plaintiffs concerns Facebook's internal documentation of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
19:8-9	The information redacted by Plaintiffs concerns Facebook's internal documentation of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
19:10-16	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
19:17-20	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
19:21-24	The information redacted by Plaintiffs does not need to be sealed.
19:25-28	The information redacted by Plaintiffs does not need to be sealed.
20:2-22	The information redacted by Plaintiffs does not need to be sealed.
20:23-24	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
21:11-17	The information redacted by Plaintiffs does not need to be sealed.
21:18-24	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
22:1-4	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
22:5-15	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.

<b>Sealable Portions</b>	<b>Reason for Confidentiality</b>
22:16-25	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
23:8-26	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
24:1-14	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
24:15-20	The information redacted by Plaintiffs concerns business and engineering decisions regarding Facebook's messages technology that is entitled to protection under the law.
24:21-25:2	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
25:3-6	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
25:7-12	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
25:14-17	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
25:18	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
25:19-22	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
25:24-26:2	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
26:3-7	The information redacted by Plaintiffs concerns business and engineering decisions regarding Facebook's messages technology that is entitled to protection under the law.
26:8-13	The information redacted by Plaintiffs concerns a Facebook internal discussion of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.

<b>Sealable Portions</b>	<b>Reason for Confidentiality</b>
26:15-16	The information redacted by Plaintiffs does not need to be sealed.
26:17-19	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
26:20	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
26:21-22	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
26:24-26	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
26:27	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
27:1-3	The information redacted by Plaintiffs concerns Facebook's internal documentation of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
27:4-8	The information redacted by Plaintiffs concerns Facebook's internal documentation of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
27:9-11	The information redacted by Plaintiffs does not need to be sealed.
27:13	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
27:14-15	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
27:16-25	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
28:1-3	The information redacted by Plaintiffs concerns Facebook's internal documentation of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
28:4-10	The information redacted by Plaintiffs concerns Facebook's internal documentation of the processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
28:11-13	This information contains the Facebook identification information of a named Plaintiff, and the Court previously found there is good cause to seal information showing Facebook identifications. (Dkt. No. 131).
28:20-21	The information redacted by Plaintiffs concerns the processes and

Sealable Portions	Reason for Confidentiality
	functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
28:24-26	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
28:27	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
29:2	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
29:3 (from beginning of line to “If so”)	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
29:3 (between “If so, the” and “Facebook user’s ID could be selected”)	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
29:4-9	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
29:11	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
29:12-13	The information redacted by Plaintiffs does not need to be sealed.
29:16	The information redacted by Plaintiffs does not need to be sealed.
29:17	The information redacted by Plaintiffs does not need to be sealed.
29:18	The information redacted by Plaintiffs does not need to be sealed.
29:19	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
30:4	The information redacted by Plaintiffs does not need to be sealed.
30:7-14	This information contains portions of Facebook’s Second Supplemental Responses and Objections to Plaintiffs’ Narrowed Second Set of Interrogatories. The referenced portion of Facebook’s discovery responses concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
30:15-22	This information contains portions of Facebook’s Second Supplemental Responses and Objections to Plaintiffs’ Narrowed Second Set of Interrogatories. The referenced portion of Facebook’s discovery responses concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
30:24	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade

Sealable Portions	Reason for Confidentiality
	secret or otherwise entitled to protection under the law.
30:25	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
31:1	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
31:3-4	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
31:8-10	The information redacted by Plaintiffs is deposition testimony of a Facebook employee and concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
31:11-13	The information redacted by Plaintiffs is deposition testimony of a Facebook employee and concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
31:14-19	The information redacted by Plaintiffs is deposition testimony of a Facebook employee and concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
31:20-23	The information redacted by Plaintiffs is deposition testimony of a Facebook employee and concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
31:24-32:2	The information redacted by Plaintiffs is deposition testimony of a Facebook employee and concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
32:3-7	The information redacted by Plaintiffs is deposition testimony of a Facebook employee and concerns the internal processes and functionality of Facebook's messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
32:16	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
32:17-18	The information redacted by Plaintiffs does not need to be sealed.
32:20	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
32:21-22	The information redacted by Plaintiffs concerns the processes and functionality of Facebook's source code that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 50 at 32:26-27	The information redacted by Plaintiffs is deposition testimony of a Facebook employee and concerns the internal processes and

<b>Sealable Portions</b>	<b>Reason for Confidentiality</b>
	functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
33:1-2	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
33:3-4	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
33:4	The information redacted by Plaintiffs concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 53 at 33:27-28	The information redacted by Plaintiffs is deposition testimony of a Facebook employee and concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.

**The Torres Report**

5. Good cause exists to seal portions of the Torres Report. Specifically, the following portions contain non-public, confidential, and proprietary Facebook business information that Facebook designated as HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY pursuant to the Protective Order. The public does not have a meaningful interest in obtaining such information, and public disclosure of this information would cause particularized 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 the people who use Facebook’s services.

<b>Sealable Portions</b>	<b>Text</b>
3:7-9	The information redacted by Plaintiffs does not need to be sealed.
3:13-14	This information concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
12:1-9	The information redacted by Plaintiffs does not need to be sealed.
12:11-12	The information concerns a Facebook internal discussion regarding Facebook’s social plugin tools that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 54 at 12:22-23	The information concerns a Facebook internal discussion regarding Facebook’s social plugin tools that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 55 at 12:24	The information concerns a Facebook internal discussion regarding

Sealable Portions	Text
	Facebook’s social plugin tools that is protectable as a trade secret or otherwise entitled to protection under the law.
13:5-8	This information concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
fn. 83 at 18:23-25	Only the text following “From the document production” needs to be redacted.  The information concerns a Facebook internal discussion regarding Facebook’s social plugin tools that is protectable as a trade secret or otherwise entitled to protection under the law.

**Facebook’s Supplemental Discovery Responses**

6. Good cause exists to seal the information redacted by Plaintiffs within the columns entitled “To,” “From,” “Date,” “URL” in Exhibit 1 to Facebook’s Supplemental Discovery Responses, as the Court previously held that there was good cause to seal the identifying information about the senders and recipients on the messages included in Exhibit 1, as well as the time and date of the messages, and the URL contained in the messages. (Dkt. No. 131.) As the Magistrate Judge noted in her prior order, the exposure of the redacted information in Exhibit 1 to Facebook’s Supplemental Discovery Responses “risks subjecting the persons identified in this document to annoyance, embarrassment, or other significant harm, and the public has no meaningful need to obtain this information at this time.” *Id.*

**Exhibits to the Gardner Cert. Declaration**

7. Good cause exists to seal Exhibits 4-18, 27-30, and 34-35 to the Gardner Cert. Declaration (Exhibits I through DD to the Gardner Declaration in support of Plaintiffs’ motion to seal) under seal in their entirety for the reasons specified below. Specifically, the Exhibits contain non-public, confidential, and proprietary Facebook business information that Facebook designated as HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY pursuant to the Protective Order. The public does not have a meaningful interest in obtaining such information, and public disclosure of this information would cause particularized 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

1 security of Facebook’s messages technology, causing harm to Facebook and the people who use  
2 Facebook’s services.

3 8. Plaintiffs also proposed to file Exhibit 3 to the Gardner Cert. Declaration—Facebook’s  
4 Supplemental Responses and Objections to Plaintiffs’ First Set of Interrogatories (Exhibit H to the  
5 Gardner Declaration in support of Plaintiffs’ motion to seal)—under seal in its entirety, but the  
6 Magistrate Judge previously held that there was good cause to seal only certain portions of Exhibit 3,  
7 as those portions contain potential trade secrets or otherwise protectable information relating to  
8 Facebook’s internal processes and tools that risk particularized harm to Facebook if revealed, and  
9 which the public does not at this time have a particular interest in obtaining. (Dkt. No. 131.)  
10 Accordingly, in conformity with the Court’s prior order, good cause exists to seal only the following  
11 portions of Exhibit 3 to the Gardner Cert. Declaration: 3:23-24; 5:24 (the text following “defenses in  
12 this action”)-27; 8:9-25; 9:18-11:24; 12:26-16:13; 17:9-20:24; 21:24-25:11; 26:7-29:22; 30:23-33:4;  
13 33:27-36:15; 37:15-38:18; 39:15-40:18; 41:15-42:18; 43:13-44:16; 45:16-21; and 46:18-23.

<b>Document to Be Sealed</b>	<b>Reasons for Confidentiality</b>
Exhibit J (Gardner Cert. Decl. Exhibit 4— FB000005502-R)	This document contains detailed technical information about the functionality of Facebook’s messages products and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law. The document also contains information about a named Plaintiff’s Facebook message, including the time and date of the message, as the URL contained in that message. As the Court noted in its prior order, the exposure of such information “risks subjecting the persons identified in this document to annoyance, embarrassment, or other significant harm, and the public has no meaningful need to obtain this information at this time.” (Dkt. No. 131).
Exhibit K (Gardner Cert. Decl. Exhibit 5— He Deposition Transcript)	This document contains the deposition testimony of a Facebook employee that concerns the processes and functionality of Facebook’s source code and that is protectable as a trade secret or otherwise entitled to protection under the law.
Exhibit L (Gardner Cert. Decl. Exhibit 6— FB000008489)	This document contains a Facebook internal discussion of business and engineering decisions regarding Facebook’s technology and the internal processes and functionality of Facebook’s messages technology that is entitled to protection under the law.
Exhibit M	This document contains a Facebook internal discussion of



<b>Document to Be Sealed</b>	<b>Reasons for Confidentiality</b>
1 2 3 (Gardner Cert. Decl. Exhibit 7— FB000003118)	business and engineering decisions regarding Facebook’s technology and the internal processes and functionality of Facebook’s messages technology that is entitled to protection under the law.
4 5 Exhibit N (Gardner Cert. Decl. Exhibit 8— FB000014365)	This document contains a Facebook internal discussion of business and engineering decisions regarding Facebook’s technology that is entitled to protection under the law.
6 7 Exhibit O (Gardner Cert. Decl. Exhibit 9— FB000003335)	This document contains a Facebook internal discussion of engineering decisions regarding Facebook’s social plugin technology that is entitled to protection under the law.
8 9 Exhibit P (Gardner Cert. Decl. Exhibit 10— FB000004996)	This document contains a Facebook internal discussion of business and engineering decisions regarding Facebook’s social plugin technology that is entitled to protection under the law.
10 11 Exhibit Q (Gardner Cert. Decl. Exhibit 11— FB000012539)	This document contains a Facebook internal discussion of business and engineering decisions regarding Facebook’s social plugin and other technology that is entitled to protection under the law.
12 13 14 Exhibit R (Gardner Cert. Decl. Exhibit 12— FB000008268)	This document contains Facebook’s internal documentation of the technical aspects of Facebook’s targeted advertising functionality that is protectable as a trade secret or otherwise entitled to protection under the law.
15 16 Exhibit S (Gardner Cert. Decl. Exhibit 13— FB000008722)	This document does not need to be sealed.
17 18 Exhibit T (Gardner Cert. Decl. Exhibit 14— FB000000594)	This document contains a Facebook internal discussion of business and engineering decisions regarding Facebook’s social plugin and messages technology that is entitled to protection under the law.
19 20 21 Exhibit U (Gardner Cert. Decl. Exhibit 15— FB000008304)	This document contains a Facebook internal discussion of business and engineering decisions regarding Facebook’s social plugin technology that is entitled to protection under the law.
22 23 Exhibit V (Gardner Cert. Decl. Exhibit 16—FB000001265)	This document contains a Facebook internal discussion of business and engineering decisions regarding Facebook’s social plugin and messages technology that is entitled to protection under the law.
24 25 Exhibit W (Gardner Cert. Decl. Exhibit 17— FB000006429)	This document contains a Facebook internal discussion of business and engineering decisions regarding Facebook’s social plugin and messages technology that is entitled to protection under the law.
26 27 28 Exhibit X (Gardner Cert. Decl. Exhibit 18— FB000008271)	This document contains a Facebook internal discussion of business and engineering decisions regarding Facebook’s social plugin and messages technology that is entitled to protection under the law.

Document to Be Sealed	Reasons for Confidentiality
Exhibit Y (Gardner Cert. Decl. Exhibit 27—FB000006435)	This document contains a Facebook internal discussion of business and engineering decisions regarding Facebook’s social plugin and messages technology that is entitled to protection under the law.
Exhibit Z (Gardner Cert. Decl. Exhibit 28—FB000004406)	This document contains a Facebook internal discussion of business and engineering decisions regarding Facebook’s social plugin and messages technology that is entitled to protection under the law.
Exhibit AA (Gardner Cert. Decl. Exhibit 29— FB000007924)	This document contains a Facebook internal discussion of business and engineering decisions regarding Facebook’s social plugin and messages technology that is entitled to protection under the law.
Exhibit BB (Gardner Cert. Decl. Exhibit 30— FB000000502)	This document contains a Facebook internal discussion of business and engineering decisions regarding Facebook’s social plugin and messages technology that is entitled to protection under the law.
Exhibit CC (Gardner Cert. Decl. Exhibit 34—FB00000802)	This document contains a Facebook internal discussion of business and engineering decisions regarding Facebook’s social plugin and messages technology that is entitled to protection under the law.
Exhibit DD (Gardner Cert. Decl. Exhibit 35—FB000005802-R)	This document contains detailed technical information about the functionality of Facebook’s messages products and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law. The document also contains information about a named Plaintiff’s Facebook message, including the time and date of the message, as the URL contained in that message. As the Court noted in its prior order, the exposure of such information “risks subjecting the persons identified in this document to annoyance, embarrassment, or other significant harm, and the public has no meaningful need to obtain this information at this time.” (Dkt. No. 131).

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct, and that I executed this Declaration in Menlo Park, California on November 17, 2015.

*/s/ Nikki Stitt Sokol*

Nikki Stitt Sokol

**ATTORNEY ATTESTATION**

1 I, Joshua A. Jessen, attest that concurrence in the filing of this Declaration of Nikki Stitt Sokol  
2 has been obtained from the signatory. I declare under penalty of perjury under the laws of the United  
3 States of America that the foregoing is true and correct. Executed this 17th day of November 2015,  
4 in Irvine, California.  
5

6 Dated: November 17, 2015

/s/ Joshua A. Jessen

Joshua A. Jessen