

EXHIBIT X

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14 FACEBOOK, INC.

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

18 MATTHEW CAMPBELL, MICHAEL
19 HURLEY, and DAVID SHADPOUR,

20 Plaintiffs,

21 v.

22 FACEBOOK, INC.,

23 Defendant.

Case No. C 13-05996 PJH (MEJ)

PUTATIVE CLASS ACTION

**DEFENDANT FACEBOOK, INC.'S
RESPONSES AND OBJECTIONS TO
PLAINTIFFS' FIRST SET OF REQUESTS
FOR ADMISSION**

1 Defendant Facebook, Inc. (“Defendant” or “Facebook”), by and through its attorneys, and
2 pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, the Local Civil Rules of the U.S.
3 District Court for the Northern District of California, the Court orders in this action, and the parties’
4 agreements and conferences among counsel, provides the following responses and objections to
5 Plaintiffs’ First Set of Requests for Admission (each, a “Request,” collectively the “Requests”).

6 **OBJECTIONS TO DEFINITIONS**

7 1. Facebook objects to Plaintiffs’ definition and use of the terms “You” or “Your” as
8 vague, ambiguous, overly broad, and unduly burdensome to the extent the terms are meant to include
9 “directors, officers, employees, partners, members, representatives, agents (including attorneys,
10 accountants, consultants, investment advisors or bankers), and any other person purporting to act on
11 [Facebook, Inc.’s] behalf. . . . parents, subsidiaries, affiliates, predecessor entities, successor entities,
12 divisions, departments, groups, acquired entities and/or related entities or any other entity acting or
13 purporting to act on its behalf” over which Facebook exercises no control, and to the extent that
14 Plaintiffs purport to use these terms to impose obligations that go beyond the requirements of the
15 Federal and Local Rules.

16 **OBJECTION TO PURPORTED “RELEVANT TIME PERIOD”**

17 Facebook objects to Plaintiffs’ proposed “Relevant Time Period” (September 26, 2006
18 through the present) because it substantially exceeds the proposed class period identified in Plaintiffs’
19 Consolidated Amended Complaint, does not reflect the time period that is relevant to Plaintiffs’
20 claims in this action, and renders the Requests overly broad, unduly burdensome, and irrelevant.
21 Unless otherwise specified, and pursuant to the agreement of the parties, Facebook’s Responses to
22 these Requests will be limited to information generated between April 1, 2010 and December 30,
23 2013.

24 **SPECIFIC RESPONSES AND OBJECTIONS TO REQUESTS FOR ADMISSIONS**

25 **REQUEST FOR ADMISSION NO. 1:**

26 Admit that You have never had “a dedicated team of privacy professionals,” as that term
27 appears in Your 2012 Form 10-K and Your 2013 Form 10-K.
28

1 **PROOF OF SERVICE**

2 I, Ashley M. Rogers, declare as follows:

3 I am employed in the County of Santa Clara, State of California, I am over the age of eighteen
4 years and am not a party to this action; my business address is 1881 Page Mill Road, Palo Alto, CA
94304-1211, in said County and State. On June 29, 2015, I served the following document(s):

5 **DEFENDANT FACEBOOK, INC.’S RESPONSES AND OBJECTIONS TO**
6 **PLAINTIFFS’ FIRST SET OF REQUESTS FOR ADMISSION**

7 on the parties stated below, by the following means of service:

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- BY ELECTRONIC SERVICE:** On the above-mentioned date, based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at the electronic notification addresses as shown above.
- I am employed in the office of Joshua A. Jessen and am a member of the bar of this court.
- I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 29, 2015.

/s/
Ashley M. Rogers