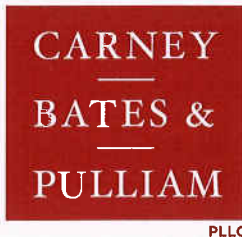


EXHIBIT Y



April 7, 2015

VIA E-MAIL

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RE: *Campbell v. Facebook, Inc.*, N.D. Cal. Case No. 13-cv-05996-PJH

Counsel:

I am writing to follow-up on two sets of issues we discussed during the meet and confer on March 17, 2015.

First, Plaintiffs are amenable to limiting the "Relevant Time Period" in Plaintiffs' First Set of Requests for Document Production to the period beginning on April 1, 2010 and extending to the date of filing of this action (December 30, 2013). Please let us know if Facebook is agreeable to producing documents within this compromise time period. If we cannot reach closure on this issue prior to April 13th, we will seek Magistrate Judge James's assistance in resolving this issue at the discovery conference.

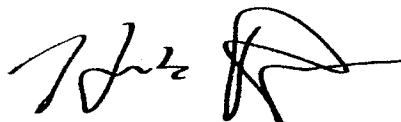
In addition, based on our discussions at the meet and confer, Plaintiffs are willing to limit, unilaterally, the following document requests as detailed below. Note that these proposed limitations are only for the present and that we reserve all rights under Federal Rule of Civil Procedure 26 to seek, at some future date, the full scope of discovery stated in our Requests for Production.

- Request for Production No. 12: Plaintiffs are willing to table this Request at present.
- Request for Production No. 15: Plaintiffs are willing to table this Request at present.

- Request for Production No. 16: Plaintiffs are willing to limit the scope of this Request to the context of Passive Likes.
- Request for Production No. 17: Plaintiffs are willing to limit the scope of this Request to the context of Passive Likes.
- Request for Production No. 18: Plaintiffs are willing to table this Request at present.
- Request for Production No. 23: Plaintiffs are willing to table this Request at present.
- Request for Production No. 24: Plaintiffs are willing to table this Request at present.
- Request for Production No. 27: Plaintiffs are willing to limit the scope of this Request to the context of Private Messages.
- Request for Production No. 28: Plaintiffs are willing to limit the scope of this Request to the context of Private Messages.
- Request for Production No. 29: Plaintiffs are willing to limit the scope of this Request to the context of the three areas enumerated in the Request (obtaining consent of Facebook Users for Your practices implicating privacy and data use; Private Messages; and the acts and practices described in the Complaint).
- Request for Production No. 30: Plaintiffs are willing to limit the scope of this Request to the context of Private Messages.

If you are amenable to producing documents consistent with the proposed limitations set forth above, we request that you let us know by end of business on Friday, April 10, 2015.

Sincerely,

A handwritten signature in black ink, appearing to read 'Hank Bates', with a stylized flourish extending to the right.

Hank Bates

HB/jcg