

# EXHIBIT JJ

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
MATTHEW CAMPBELL, MICHAEL  
HURLEY, and DAVID SHADPOUR,  
on behalf of themselves and  
all others similarly situated,  
Plaintiffs,  
vs. No. 4:13-cv-05996-PJH  
FACEBOOK, INC.,  
Defendants.

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\*\*HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY\*\*

\*\*CONTAINS SOURCE CODE\*\*

VIDEOTAPED 30(b)(6) DEPOSITION OF  
MICHAEL ADKINS  
Wednesday, October 28, 2015

Reported by:  
COREY W. ANDERSON  
CSR No. 4096  
Job No. SF 2173701A  
PAGES 1 - 124

1 Q. Okay. And I saw that earlier prior to the 10:46:31  
2 deposition and at the beginning of it you were doing 10:46:37  
3 something with the computer. What were you doing 10:46:41  
4 initially? 10:46:45

5 A. The source code as delivered appeared to 10:46:47  
6 be compressed. 10:46:49

7 Q. Uh-huh. 10:46:51

8 A. And when compressed into a single archive 10:46:53  
9 you cannot inspect the individual files. 10:46:56

10 So I decompressed it onto the file system 10:47:01  
11 of the computer in the event that I would need to 10:47:04  
12 access the individual source files for the purposes 10:47:07  
13 of the deposition. 10:47:10

14 Q. As part of your preparation for this 10:47:11  
15 deposition, did you review the source code that 10:47:31  
16 specifically relates to topic 1 (c)? 10:47:35

17 A. I reviewed the source code for [REDACTED] and 10:47:38  
18 [REDACTED] 10:47:43

19 Q. Okay. Can you please identify the source 10:47:43  
20 code that carries out the processes characterized in 10:47:56  
21 section 1 (c)? 10:48:01

22 A. Yes. 10:48:09

23 Q. Please do. 10:48:10

24 A. [REDACTED] 10:48:49  
25 [REDACTED] 10:48:51

1	[REDACTED]	11:04:15
2	[REDACTED]	11:04:24
3	[REDACTED]	11:04:29
4	[REDACTED]	11:04:35
5	[REDACTED]	11:04:40
6	[REDACTED]	11:04:45
7	[REDACTED]	11:04:48
8	[REDACTED]	11:04:53
9	[REDACTED],	11:04:54
10	[REDACTED]	11:05:01
11	[REDACTED].	11:05:06
12	[REDACTED]	11:05:12
13	[REDACTED]	11:05:13
14	[REDACTED].	11:05:20
15	Q. I believe you said that the [REDACTED]	11:05:22
16	[REDACTED]	11:05:27
17	[REDACTED]?	11:05:30
18	A. Yes. So if you are using an online	11:05:33
19	product, and let's say you are writing the name of a	11:05:36
20	person you know or you are typing an e-mail address,	11:05:39
21	the product might have a list of recognizable search	11:05:46
22	terms which it would then offer to fill in for you	11:05:50
23	so you do not have to type the entire name or	11:05:53
24	address.	11:06:01
25	Q. During the 2010 to 2012 timeframe when	11:06:02

1 A. This is [REDACTED]. 12:06:17

2 Q. And where is it located? 12:06:22

3 A. It is in [REDACTED] 12:06:23

4 [REDACTED]. 12:06:28

5 Q. What are the relevant features that [REDACTED] 12:06:36

6 has to take into account? 12:06:38

7 A. Relevant features [REDACTED] 12:06:41

8 [REDACTED] 12:06:43

9 [REDACTED] 12:06:48

10 [REDACTED] 12:06:51

11 [REDACTED] 12:06:53

12 [REDACTED] 12:06:55

13 [REDACTED] [REDACTED] 12:06:58

14 [REDACTED] 12:07:01

15 [REDACTED] 12:07:05

16 [REDACTED] 12:07:07

17 [REDACTED] 12:07:11

18 [REDACTED] 12:07:15

19 [REDACTED] 12:07:20

20 [REDACTED] 12:07:22

21 [REDACTED] 12:07:23

22 [REDACTED] 12:07:26

23 [REDACTED] 12:07:28

24 [REDACTED]. 12:07:30

25 [REDACTED] 12:07:35

1	[REDACTED].	12:07:38
2	[REDACTED]	12:07:49
3	[REDACTED]	12:07:53
4	[REDACTED]	12:07:56
5	[REDACTED]	12:08:00
6	[REDACTED]	12:08:02
7	[REDACTED] [REDACTED]	12:08:06
8	[REDACTED].	12:08:08
9	[REDACTED] [REDACTED]	12:08:15
10	[REDACTED].	12:08:20
11	Q. The [REDACTED]?	12:08:37
12	A. Uh-huh.	12:08:39
13	Q. That's one of the files we were looking	12:08:40
14	at. Where --	12:08:41
15	A. That is this file.	12:08:42
16	Q. That's this file?	12:08:43
17	A. Yes.	12:08:44
18	Q. Where is the [REDACTED] in this?	12:08:44
19	A. That's it (indicating). [REDACTED]	12:08:49
20	[REDACTED] [REDACTED]	12:08:55
21	[REDACTED]	12:09:02
22	[REDACTED]	12:09:05
23	[REDACTED]	12:09:08
24	[REDACTED]	12:09:11
25	[REDACTED]	12:09:21

1 [REDACTED] 12:09:25  
2 [REDACTED] 12:09:28  
3 [REDACTED] 12:09:31  
4 [REDACTED]. 12:09:34  
5 [REDACTED] 12:09:35  
6 [REDACTED]. 12:09:38  
7 Q. So the Facebook abuse- and 12:09:45  
8 security-related platform that's referenced in this 12:09:47  
9 section? 12:09:52  
10 A. Uh-huh. 12:09:53  
11 Q. Is [REDACTED]? 12:09:53  
12 A. I would say that is [REDACTED]. 12:09:55  
13 Q. [REDACTED] [REDACTED] [REDACTED] [REDACTED] 12:10:01  
14 [REDACTED] [REDACTED] 12:10:01  
15 A. Those would be the ones we previously 12:10:03  
16 discussed: [REDACTED] sigma, et cetera. 12:10:05  
17 Q. Which, what's the name of the [REDACTED] [REDACTED] 12:10:48  
18 [REDACTED]? 12:10:48  
19 A. The name of the [REDACTED]? 12:10:51  
20 Q. Uh-huh. 12:10:53  
21 A. It is simply called [REDACTED]. 12:10:54  
22 Q. Okay. And what does that function 12:10:56  
23 perform? 12:11:00  
24 A. That is simply the [REDACTED] 12:11:01  
25 [REDACTED]. 12:11:05

1 A. Uh-huh. 13:44:52

2 Q. States [REDACTED], 13:44:54

3 [REDACTED] 13:44:56

4 [REDACTED] 13:45:00

5 [REDACTED] 13:45:02

6 [REDACTED] 13:45:05

7 [REDACTED] 13:45:07

8 [REDACTED]. " 13:45:10

9 Is that correct? 13:45:13

10 A. That is correct. 13:45:14

11 Q. What are the [REDACTED] that are 13:45:21

12 being referred to here? 13:45:24

13 A. [REDACTED] 13:45:26

14 [REDACTED] 13:45:30

15 [REDACTED] 13:45:33

16 [REDACTED] 13:45:37

17 [REDACTED] 13:45:41

18 [REDACTED] 13:45:44

19 [REDACTED] 13:45:48

20 [REDACTED]. 13:45:51

21 Q. Where is the source code that carries out 13:46:05

22 this functionality? 13:46:07

23 A. [REDACTED] 13:46:11

24 [REDACTED] 13:46:13

25 [REDACTED] 13:46:16



1 [REDACTED] 13:46:22

2 [REDACTED]. 13:46:25

3 Q. What [REDACTED] 13:46:32

4 [REDACTED] would be available to the 13:46:35

5 integrity and abuse- and security-related platforms? 13:46:38

6 A. [REDACTED] that -- and I'm 13:46:45

7 not sure that "[REDACTED]" is quite the correct 13:46:48

8 word, it's probably just more like [REDACTED] 13:46:51

9 [REDACTED] 13:46:53

10 [REDACTED] 13:46:57

11 [REDACTED]. 13:47:00

12 Q. What format was the [REDACTED] 13:47:30

13 [REDACTED] stored in? 13:47:33

14 A. I believe it would be [REDACTED] 13:47:41

15 [REDACTED]. 13:47:43

16 Q. Okay. And where does that [REDACTED] 13:47:51

17 [REDACTED]? 13:47:54

18 A. [REDACTED] 13:47:55

19 [REDACTED] 13:48:00

20 [REDACTED]. 13:48:06

21 Q. And where are the [REDACTED] 13:48:16

22 [REDACTED]? I'm sorry, withdrawn. 13:48:18

23 [REDACTED] 13:48:20

24 [REDACTED]? 13:48:22

25 A. They are similar to [REDACTED] 13:48:27

1 I, the undersigned, a Certified Shorthand  
2 Reporter of the State of California, do hereby  
3 certify:

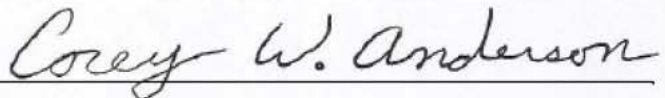
4 That the foregoing proceedings were taken  
5 before me at the time and place herein set forth;  
6 that any witnesses in the foregoing proceedings,  
7 prior to testifying, were administered an oath; that  
8 a record of the proceedings was made by me using  
9 machine shorthand which was thereafter transcribed  
10 under my direction; that the foregoing transcript is  
11 a true record of the testimony given.

12 Further, that if the foregoing pertains to  
13 the original transcript of a deposition in a Federal  
14 Case, before completion of the proceedings, review  
15 of the transcript was not requested.

16 I further certify I am neither financially  
17 interested in the action nor a relative or employee  
18 of any attorney or any party to this action.

19 IN WITNESS WHEREOF, I have this date  
20 subscribed my name.

21 Dated: 10/30/2015

22   
23

24 COREY W. ANDERSON

25 CSR No. 4096

### Errata

Case: *Campbell et al. v. Facebook, Inc.*

Case No. 13-CV-05996-PJH

Date of Deposition: October 28, 2015

Name of Deponent: **Michael Adkins**

Reason codes:

1. To clarify the record.
2. To conform to the facts.
3. To correct transcription errors.

Page	Line	Reads	Should Read	Reason
Global		██████████	██████████	1
Global		██████████	██████████	1
Global		██████████	██████████	1
Global		sigma	Sigma	1
13	12	at – during my time at Facebook.	during my time at Facebook.	1
16	18	some – some time ago, some number of months ago.	some time ago, some number of months ago.	1
16	23	there – that this case existed and that we were on	this case existed and that we were on	1
19	17	If – if I was notified of a case like	If I was notified of a case like	1
20	2	I can't remember precisely or than that I	I can't remember precisely other than that I	3
20	3	was looking for anything specific. Mostly just	wasn't looking for anything specific. Mostly just	3
24	19	I have – I have seen	I have seen	1
34	8	operational reasons why not such as system outages	operational reasons why not, such as system outages	1
37	7	machine learned	machine-learned	1
38	17	building a	building the	3
41	22	set to – to dictate	set to dictate	1
42	10	team, it	team. It	1
43	2-3	and Windows phones. If we need a new feature – each of which	and Windows phones, each of which	1
47	21	██████████	██████████	3

Page	Line	Reads	Should Read	Reason
48	20-23	So we request, [REDACTED]	We [REDACTED]	1
50	6	do the thing you are supposed to do	“do the thing you are supposed to do”	1
54	11	service to team to generate a preview	service to attempt to generate a preview	3
61	15	details	detailed	3
65	16	message’s	Messages	3
65	17	post send	post-send	3
68	10	message’s	Messages	3
69	11	pass	passed	3
72	24	sender allowed to send	sender is allowed to send	3
76	24	and then we call it [REDACTED]	and then we call [REDACTED]	3
80	4	machine learned	machine-learned	3
80	24	,	that	1
81	19	to black	to the black	1
83	21	miss behave	misbehave	3
84	15	taken is	taken it is	3
87	3	small attachments	small. Attachments	3
89	19	is in sigma this is in	is in Sigma. This is in	3
101	9	sand attach reports	and attachments	3
119	8	that	[remove]	1
121	9	Is it	It is	3



Michael Adkins