

EXHIBIT Z

May 13, 2015

VIA ELECTRONIC MAIL

Hank Bates, Esq.
Carney Bates & Pulliam, PLLC
2800 Cantrell Road, Suite 510
Little Rock, AR 72202

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

Dear Hank:

Thank you for letter of May 1, 2015.

In response to the questions raised in the first paragraph of your letter, we have identified the following six custodians and are in the process of collecting and reviewing their documents based on the search terms set forth in the Appendix attached to this letter: Michael Adkins; Alex Himel; Ray He; Matt Jones; Jordan Blackthorne; and Peng Fan. Additionally, we are in the process of identifying additional custodians based on a review of relevant documents in the possession of the above-named custodians.

Please let us know if you have any objection to the search terms we are using or any questions about the identified custodians.

With respect to the issues raised in the second paragraph of your letter, we are gathering all documents we have agreed to produce and will provide them as they are ready for production. We anticipate another production on June 1, which will include many of these documents (in addition to the documents we will be producing pursuant to Magistrate Judge James' April 13, 2015 Order). Facebook maintains its objections to Plaintiffs' Request for Production Nos. 27, 28, and 30 (even as narrowed by your letter of April 7, 2015). Please also note that Facebook has not been contacted by regulators in the United States regarding the practices at issue in this case, including message "scanning," so to the extent your requests seek such documents, they do not exist. Also, as I noted in my letter of April 10, 2015, with respect to Request No. 29, there is no specific list of the "dedicated team of privacy professionals" referenced in the Request.

Finally, with respect to the "Relevant Time Period" proposed in your letter dated April 7, 2015 (April 1, 2010 to December 30, 2013), in the interests of compromise we are amenable to agreeing to an end date of December 30, 2013—notwithstanding the fact that Plaintiffs

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allege in their Complaint that “Facebook ceased [its] [allegedly] illegal practice at some point after it was exposed in October 2012.” However, we continue to believe that the start date should be the start of the proposed class period (December 30, 2011), although we are amenable to producing documents before that date sufficient to identify when the challenged practice began. Please let us know if this agreeable.

Let me know if you would like to arrange a call to discuss these issues further.

Also, if there are additional custodians from whom you plan to collect documents (in addition to the named Plaintiffs), please identify them. As noted in our previous requests, please also let us know when we may expect documents from Mr. Shadpour.

Sincerely,

A handwritten signature in black ink, appearing to read "Joshua A. Jessen". The signature is fluid and cursive, with a large initial "J" and "A".

Joshua A. Jessen

Appendix

<u>List of Search Terms</u>
("like button count" or "like count" or "Like plugin" or "like plug-in") w/25 (message! or messenger or titan or chat!)
("share object" or "share_object") w/25 (message! or messenger or titan or chat!)
("share button" or "share_button") w/25 (message! or messenger or titan or chat!)
(Sharecount or share_count or "share count") w/25 (message! or messenger or titan or chat!)
(Postcount or Post_count) w/25 (message! or messenger or titan or chat!)
("social plugin" or "social plug-in") w/25 (message! or messenger or titan or chat!)
"share/like counter" w/25 (message! or messenger or titan or chat!)
(url or urls) and share and (message! or messenger or titan or chat!)
(url or urls) and preview and (message! or messenger or titan or chat!)
(message! or messenger or titan) w/25 (scan!)
(message! or messenger or titan) w/25 (process!)
(message! or messenger or titan) and (spam! or filter or "junk" or "unsolicited") (Bug or error) w/25 ("like count" or "like button count" or sharecount or "share count" or "share stats") and (message! or messenger or titan)
"Graph API" w/25 ("like count" or "like button count" or sharecount or "share count" or "share stats") and (message! or messenger or titan)
(message! or messenger or titan) w/25 (advertising or advertiser! or ads)
(message! or messenger or titan) w/25 target!
"Site integrity" w/25 (architecture or flow or diagram or chart or graph or tree) and (message! or messenger or titan)
(message! or messenger or titan) w/25 (architecture or flow or diagram or chart or graph or tree)
(sharescrapper or "share scrapper" or share_scrapper or share-scrapper) w/25 (message! or messenger or titan or chat!)
Kashmirhill and yahootix
forbes and (messages or messenger or "like button" or "like count" or "share count")
wsj and (messages or messenger or "like button" or "like count" or "share count")
"wall street journal" and (messages or messenger or "like button" or "like count" or "share count")
("Digital Trends" or "digitaltrends.com") and "Bug" and "Facebook" and "Like"

(“Hacker News” or “news.ycombinator.com”) and “Facebook Graph API”

(“Hacker News” or “news.ycombinator.com”) and “Facebook” and “likes”