

EXHIBIT AA

June 12, 2015

VIA ELECTRONIC MAIL

David Rudolph, Esq.
Lieff Cabraser Heimann & Bernstein, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111

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

Dear David:

Thank you for your letter of June 5, 2015.

First, as I noted in my May 13, 2015 letter to Hank Bates, in response to Plaintiffs' offer to compromise, Facebook will produce documents through an end date of December 30, 2013.

Second, with respect to a production start date, while the Himel Declaration does discuss certain events dating back to September 2009 to provide context for the practice that Plaintiffs challenge, the exhibits to the Declaration show that the challenged practice did not commence until August 2010. However, in the interests of compromise, we are amenable to a production start date of April 2010, as proposed by Hank in his letter of April 7, 2015. If there are specific requests or custodians for whom Plaintiffs believe an earlier start date is appropriate, we are willing to discuss that with you. But an *en masse* collection and production of documents going back to 2009 is overbroad, unduly burdensome, and inappropriate, and also would be inconsistent with the proportionality requirement in Rule 26(b)(2)(C) and (g)(1)(B), the Stipulated Order re Discovery of Electronically Stored Information in this case (Dkt. 74), as well as the District Court's ESI Guideline 1.03.

Finally, we are still in the process of determining what legal obligations (including notification obligations) may exist with respect to potentially producing any communications

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exchanged between Facebook and the Irish Data Protection Commissioner regarding Facebook's Messages Product. I expect to have a better idea of those obligations next week and will revert to you at that time.

Sincerely,

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

Joshua A. Jessen