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FACEBOOK, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISON

MATTHEW CAMPBELL and MICHAEL HURLEY,

Plaintiffs,

v.

FACEBOOK, INC.,

Defendant.

Case No. C 13-05996 PJH (MEJ)

PUTATIVE CLASS ACTION

DECLARATION OF MICHAEL ADKINS IN SUPPORT OF DEFENDANT FACEBOOK, INC.'S OPPOSITION TO PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

REDACTED VERSION OF DOCUMENT(S) SOUGHT TO BE SEALED

I, Michael Adkins, declare as follows:

1. I have been employed as a software engineer at Facebook since May 2010, and my current title is Engineering Manager. I am over the age of 18. I have worked on the Facebook Messages product to build anti-abuse, security, and anti-phishing systems for the Facebook Messages product. My responsibilities generally involve ensuring the integrity of messages passing through Facebook's system to ensure that they are not malicious, fraudulent, or spam. My work thus encompasses [redacted] one of Facebook's suite of anti-abuse systems (also referred to as "Security" systems). Unless otherwise stated, the following facts are within my personal knowledge and, if called and sworn as a witness, I could and would testify competently to these facts.

2. I provide this Declaration to explain certain facts regarding Facebook's software code as it relates to Facebook's [redacted] and other Security-related systems, particularly as they relate to uniform resource locators ("URLs") in messages sent and received through the Facebook platform, in support of Facebook's Opposition to Plaintiffs' Motion for Class Certification.

3. As explained in further detail below, Facebook source code is configured to run [redacted] Accordingly, there are many instances when a URL or URL attachment generated in connection with a message will not lead to the creation of a [redacted]. Specifically, in those instances when a URL attachment is blocked by Sentry, no [redacted] will be created. Further, contrary to assertions I understand Plaintiffs have made in this case, [redacted] generated from URL attachments to messages for its security and anti-abuse functions.

Overview of Sentry

4. [redacted] to determine whether a message or post, or information included with it – such as a URL – is malicious, fraudulent, or otherwise harmful. For example, if a person using Facebook posts or sends a message with the URL http://clickmonkeys.com, [redacted] would analyze the URL to determine

whether it is a harmful link containing spam, malware, a virus, or the like, and whether it is likely that the sender's account has been hijacked (given that it sent a malicious or spammy URL or URLs). [redacted] can likewise run things like [redacted]

5. One general purpose of Facebook's Security systems (including [redacted], among others) is to protect people and their data when they use Facebook. For instance, Facebook encrypts user activity (whether that involves posting a status update or sending a message) so that third parties cannot access it in transit, and if an individual clicks on a spam post accidentally, Facebook's detection tools determine whether a virus has infected the individual's browser or computer and helps to remove it. [redacted] among other Security tools, was built to ward off attacks from cyber criminals, hackers, and other such individuals or entities, so that all people legitimately using Facebook can enjoy the site safely and confidently.

6. Sentry runs a series of various filters and other mechanisms by which to detect abuse or other fraudulent activity on Facebook; these include functions called [redacted] and "Sigma." [redacted] the URL typed in the text of the message [redacted]. Sigma, in turn, is a rules engine that runs a series of policies [redacted]

Sentry and URLs in Messages

7. As noted above in paragraph 3, Facebook code is configured such that [redacted]

8. *First*, during the period covered by discovery in this case (2010-2013), [redacted], Facebook would assess [redacted] This functionality can be seen [redacted] which specifically states that [redacted]

9. Specifically, if the sender typed a URL into the message and [redacted], which would in turn, [redacted] (which is contained in a system called [redacted]), it would tell [redacted]. Accordingly, no URL preview would be generated. So instead, [redacted]. This was true whether the person using Facebook was attempting to share the URL through a message or through a public post to their profile, a status message on their NewsFeed, a post to a friend's profile, or the like; [redacted] to generate a URL preview. [redacted]

10. *Second*, if a URL preview was successfully generated (and not deleted by the sender), the URL attachment would have been sent with the message when the sender pressed "Send." [redacted]

to determine and help resolve any abuse- or security-related issues. [redacted] detect large-scale automated abuse (e.g., spam, malware, phishing, and other abuse). For example, Sigma [redacted]. Likewise, the [redacted]. Further, [redacted] could be run through Facebook's [redacted]

11. [redacted], and that the sender was allowed to send messages to that recipient (i.e. the recipient had not blocked that sender). This would also include [redacted] qualify for delivery to the Inbox or whether it should be directed to the" Other" folder, based on the sender-recipient(s) relationship and the recipient's configured settings. The [redacted]. If such an error occurred, the [redacted]. If such an error occurred with respect to a URL attachment to a message, [redacted].

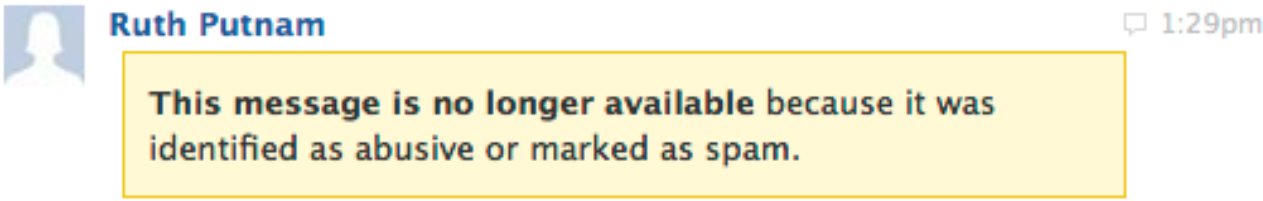
12. Further, the [redacted]. Accordingly, [redacted] may use [redacted]

[redacted]. Based on the [redacted] the sender might have seen the following security prompt:

13. [redacted], including [redacted] to perform their anti-abuse- and security-related functions. For instance, [redacted] – was available to and used by Sigma, [redacted].

14. *Third,* when a sender or a recipient tried to view the sent message, [redacted] It would once again run a [redacted] discussed in paragraphs 10-13 and if any of these threw an error, the message, part of the message, or its URL attachment may not have been rendered to the recipient. Of course, this set of checks would not occur if [redacted]

[redacted] detect that a URL attachment to the message was potentially dangerous when the recipient (or sender) tried to view it in their inbox, it could have shown the following security protocol to the recipient (or sender) when they tried to view the message and its attachment:



15. Note that, if in this process, [redacted] it could not render its URL attachment to the recipient (or sender) trying to view that message. [redacted]

Variability Among Class Members and Over Time in Connection with Sentry

16. There was considerable variability in a given instance with respect to whether [redacted] on a message and any URL attachment associated with it.

17. For efficiency reasons, the Sigma [redacted]

[redacted]. Thus, [redacted] presented by each message. It is impossible to know precisely what [redacted] will do given the variability of the input and other data [redacted] at a given time.

18. Further, each individual [redacted], Sigma, [redacted] among others) could determine whether [redacted] For instance, if a sender attempted to upload a malicious file, [redacted]

19. Further, Facebook's [redacted]

20. Similarly, as described earlier above, if a sender sent a message to a recipient recognized as their Facebook friend, but the message contained a URL known to be a spammy link, [redacted]

21. Alternatively, [redacted] but was later determined by [redacted] so that it would not have rendered the URL preview attachment to the sender or recipient if they later reopened that message in their Inbox or Sent Messages folder.

22. Taking all of this variation together, at a minimum, determining whether a putative class member's share of a URL in a message actually resulted in [redacted], among other things, on whether the [redacted] Such a determination would require the following individualized inquiries *for each message*:

a. Was the message sent from the Facebook website, or was it sent using the Share Plugin on a third party website?

b. Did the sender either copy and paste a URL into the draft message text field, or type a URL into the draft text and press the space bar?

c. Was the URL to a third-party webpage (as opposed to a Facebook webpage)?

d. Was the sender using a browser that is JavaScript capable?

e. Did the sender have JavaScript enabled in her browser?

f. Did any of the [redacted]

g. When the message was sent, [redacted] or Sigma [redacted], among other things?

h. After the message had been sent, and the sender or recipient attempted to view it, was the URL attachment, or part of the message, or the whole message, [redacted]?

23. To my knowledge, neither Facebook nor any other entity possesses the data that would be required to ascertain the answers to the inquiries in paragraph 22(a)-(g), either on an individual or bulk basis, for putative class members.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on January 14, 2016, in Menlo Park, California.

/s/ Michael Adkins
Michael Adkins

ATTORNEY ATTESTATION

I, Christopher Chorba, attest that concurrence in the filing of this Declaration of Michael Adkins has been obtained from the signatory. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 15th day of January, 2016, in Los Angeles, California.

Dated: January 15, 2016

/s/ Christopher Chorba
Christopher Chorba