

Replacement for Dkt. 147-1

1 GIBSON, DUNN & CRUTCHER LLP
JOSHUA A. JESSEN, SBN 222831
2 JJessen@gibsondunn.com
JEANA BISNAR MAUTE, SBN 290573
3 JBisnarMaute@gibsondunn.com
PRIYANKA RAJAGOPALAN, SBN 278504
4 PRajagopalan@gibsondunn.com
ASHLEY M. ROGERS, SBN 286252
5 ARogers@gibsondunn.com
1881 Page Mill Road
6 Palo Alto, California 94304
Telephone: (650) 849-5300
7 Facsimile: (650) 849-5333

8 GIBSON, DUNN & CRUTCHER LLP
CHRISTOPHER CHORBA, SBN 216692
9 CChorba@gibsondunn.com
333 South Grand Avenue
10 Los Angeles, California 90071
Telephone: (213) 229-7000
11 Facsimile: (213) 229-7520

12 Attorneys for Defendant
FACEBOOK, INC.

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 OAKLAND DIVISION

17 MATTHEW CAMPBELL and MICHAEL
HURLEY,

18 Plaintiffs,

19 v.

20 FACEBOOK, INC.,

21 Defendant.

Case No. C 13-05996 PJH

PUTATIVE CLASS ACTION

**DECLARATION OF NIKKI STITT
SOKOL IN SUPPORT OF DEFENDANT
FACEBOOK, INC.'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS IN
SUPPORT OF ITS OPPOSITION TO
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION UNDER SEAL**

HEARING:

Date: March 16, 2016

Time: 9:00 A.M.

Location: Courtroom 3, Third Floor
The Honorable Phyllis J. Hamilton

1 I, Nikki Stitt Sokol, declare as follows:

2 1. I am Associate General Counsel for Litigation for Defendant Facebook, Inc.
3 (“Facebook”). Pursuant to Civil Local Rule 79-5(d) and the Amended Stipulated Protective Order
4 entered by the Court on July 1, 2015 (the “Protective Order”) (Dkt. No. 93), I submit this Declaration
5 in support of Facebook’s Administrative Motion to File Documents In Support of Its Opposition to
6 Plaintiffs’ Motion for Class Certification (“Motion to Seal”). Except as otherwise noted, I have
7 personal knowledge of the facts set forth in this Declaration and, if called and sworn as a witness,
8 could and would testify competently to them.

9 2. The Motion to Seal sets forth the documents sought to be sealed, including the
10 following:

11 (1) designated portions of Facebook’s Opposition to Plaintiffs’ Motion for Class Certification;

12 (2) designated portions of the Declaration of Christopher Chorba In Support of Defendant
13 Facebook, Inc.’s Opposition to Plaintiffs’ Motion for Class Certification (“Chorba Declaration”);
14 designated portions of Exhibits R, W, BB, CC, DD, EE, II, JJ to the Chorba Declaration; and Exhibits
15 A, B, C, D, L, M, N, O, P, Q, S, T, U, V, FF, GG, HH, KK, and LL to the Chorba Declaration in their
16 entirety;

17 (3) designated portions of the Declaration of Alex Himel In Support of Defendant Facebook,
18 Inc.’s Opposition to Plaintiffs’ Motion for Class Certification (“Himel Declaration”), and designated
19 portions of Exhibits MM, NN, and OO to the Himel Declaration;

20 (4) designated portions of the Declaration of Dan Fehete In Support of Defendant Facebook,
21 Inc.’s Opposition to Plaintiffs’ Motion for Class Certification (“Fehete Declaration”), and Exhibits
22 PP, QQ, RR, SS, TT, UU, VV, WW, XX, YY, ZZ, and AAA to the Fehete Declaration in their
23 entirety;

24 (5) designated portions of the Declaration of Michael Adkins In Support of Defendant
25 Facebook, Inc.’s Opposition to Plaintiffs’ Motion for Class Certification (“Adkins Declaration”);

26 (6) designated portions of the Expert Report of Dr. Benjamin Goldberg (“Goldberg Report”);

27 (7) designated portions of the Expert Report of Dr. Catherine Tucker (“Tucker Report”); and
28

1 (8) designated portions of the Appendix of Evidence in Support of Defendant Facebook,
2 Inc.'s Opposition to Plaintiffs' Motion for Class Certification ("Appendix of Evidence").

3 **Facebook's Opposition to Plaintiffs' Motion for Class Certification**

4 3. Good cause exists to seal portions of Facebook's Opposition to Plaintiffs' Motion for
5 Class Certification (Exhibit 1 to the Motion to Seal). Specifically, the following portions contain
6 non-public, confidential, and proprietary Facebook business information or testimony of individual
7 named Plaintiffs designated as CONFIDENTIAL or HIGHLY CONFIDENTIAL – ATTORNEYS'
8 EYES ONLY pursuant to the Amended Stipulated Protective Order. The public does not at this time
9 have a meaningful interest in obtaining such information, and public disclosure of this information
10 would cause particularized harm to Facebook by allowing its competitors to access sensitive
11 information, which they could use to gain an unfair advantage against Facebook. Such information
12 could also be used by individuals or companies that might seek to compromise the security of
13 Facebook's messages technology, causing harm to Facebook and the people who use Facebook's
14 services:

Sealable Portions	Reason for Confidentiality
2:17-18, 24-2; 3:16-17; 4:9-17; 7:20-22; 11:8-9, 19-22; 12:18-22; 14:21-23; 15:15-16, 24-25; 16:1-4, 14-24, 26; 20:12-13, 17-20; 21:7-9, 15-19; 23:7-10; 26:10-12; 29:3-14; 30:2-3, 5-6	This reflects information provided in Plaintiffs' discovery responses and deposition testimony, designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order, or concerns information related to Plaintiffs' individual Facebook use from Facebook's systems.
3:3-4; 5:23-24; 6:1-3, 17-21; 7:1-16; 8:4-14; 9:10-14, 19, 22, 26; 11-1, 3-8, 9-12, 16-18, 23-28; 12:1-4, 26, 28; 13:1-10, 26-28; 14:4, 11-12, 18-19; 18:14-15, 19; 23:25-26; 26:12	This information concerns the processes and functionality of Facebook's software and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law, or concerns topics whose discussion would reveal facts regarding that software and those internal tools.
8:20-22; 20:5-6	This is non-public, confidential, and proprietary business metrics and analytics information that is competitively sensitive and that risks particularized harm to Facebook if revealed, and which the public does not have a particular interest in obtaining.
21:23-28	This information includes Facebook internal discussions regarding the processes and functionality of Facebook's technology and business and engineering decisions that is protectable as a trade

Sealable Portions	Reason for Confidentiality
	secret or otherwise entitled to protection under the law.
25:3-4	This concerns testimony from Plaintiffs' technical expert, Dr. Jennifer Golbeck, who opined on the processes and functionality of Facebook's software and internal tools that are protectable as a trade secret or otherwise entitled to protection under the law.
27:21	This concerns testimony from Plaintiffs' damages expert, Fernando Torres, who opined on calculations relying on Facebook's non-public, confidential, and proprietary business metrics and financial information that were designated as HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY by Facebook pursuant to the Amended Stipulated Protective Order.

Chorba Declaration

4. Good cause exists to seal portions of the Chorba Declaration (Exhibit 3 to the Motion to Seal). Specifically, as identified below, the information at lines 4:24-28; 5:1-2; and 5:2-4 of the Chorba Declaration contains non-public, confidential, and proprietary Facebook business information that Facebook designated as HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY pursuant to the Amended Stipulated Protective Order. The public does not at this time have a meaningful interest in obtaining such information, and public disclosure of this information would cause particularized harm to Facebook by allowing its competitors to access sensitive information, which they could use to gain an unfair advantage against Facebook. Such information could also be used by individuals or companies that might seek to compromise the security of Facebook's messages technology, causing harm to Facebook and the people who use Facebook's services. The remaining portions identified below contain or reflect information designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order. While Facebook is obligated to submit this information for sealing, Facebook takes no position on whether the information designated by Plaintiffs satisfies the requirements for sealing.

Sealable Portions	Reason for Confidentiality
2:12	This reflects information provided in Plaintiff Matthew Campbell's Corrected Objections and Responses to Defendant Facebook, Inc.'s First Set of Interrogatories, which was designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.
2:17	This reflects information provided in Plaintiff Michael Hurley's Objections and Responses to Defendant Facebook, Inc.'s First Set of Interrogatories, which was designated as CONFIDENTIAL by Plaintiffs pursuant to the

Sealable Portions	Reason for Confidentiality
	Amended Stipulated Protective Order.
2:22	This reflects information provided in Plaintiff Matthew Campbell’s Corrected Objections and Responses to Defendant Facebook, Inc.’s First Set of Interrogatories, which was designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.
3:2-11	This information supplements Plaintiffs’ responses to Defendant Facebook, Inc.’s First Set of Interrogatories, which Plaintiffs designated as CONFIDENTIAL pursuant to the Amended Stipulated Protective Order.
3:17-18; 3:18-19; 3:20-21; 4:1-2; 4:3-7	This reflects information regarding Plaintiffs Matthew Campbell’s messages, which was designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.
4:24-28; 5:1-2; 5:2-4	This reflects information from Facebook’s Second Supplemental Responses and Objections to Plaintiffs’ Narrowed Second Set of Interrogatories, which Facebook designated as HIGHLY CONFIDENTIAL – ATTORNEYS EYES ONLY pursuant to the Amended Stipulated Protective Order. The referenced portion of Facebook’s discovery responses concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law.
5:16-20; 5:23-25	This reflects information regarding Plaintiffs Matthew Campbell’s messages, which was designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.
12:14, 12:16; 12:18	This reflects information identifying absent putative class members, whose identities have been designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.

5. Facebook also moves to seal certain portions of Exhibits R, W, BB, CC, DD, EE, II, and JJ to the Chorba Declaration. Specifically, as identified below, good cause exists to seal the following portions of Exhibits BB, CC, DD, EE, II, JJ because they contain non-public, confidential, and proprietary Facebook business information that Facebook designated as HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY pursuant to the Amended Stipulated Protective Order. The public does not at this time have a meaningful interest in obtaining such information, and public disclosure of this information would cause particularized harm to Facebook by allowing its competitors to access sensitive information, which they could use to gain an unfair advantage against Facebook. Such information could also be used by individuals or companies that might seek to compromise the security of Facebook’s messages technology, causing harm to Facebook and the people who use Facebook’s services. Additionally, portions of Exhibits R and W contain or reflect information designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order. While Facebook is obligated to submit Exhibits R and W for sealing, Facebook

1 takes no position on whether the information designated by Plaintiffs satisfies the requirements for
 2 sealing.

Exhibit	Sealable Portions	Reason for Confidentiality
Exhibit R - April 10, 2015 Letter from David Rudolph to Joshua Jessen (Exhibit 5 to Motion to Seal)	Page 1, text between “response contained” and “detailed entries”	This reflects information provided in Plaintiff Matthew Campbell’s Corrected Objections and Responses to Defendant Facebook, Inc.’s First Set of Interrogatories, which was designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.
Exhibit W – July 24, 2015 Letter from David Rudolph to Joshua Jessen (Exhibit 7 to Motion to Seal)	Page 2, text between “Interrogatory No. 5 as follows” and “Plaintiffs’ Responses to Facebook’s Contention”	This information supplements Plaintiffs’ responses to Facebook Interrogatory No. 5, which was designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.
Exhibit BB – Excerpts from June 30, 2015 Deposition of Jiakai Liu (Exhibit 9 to Motion to Seal)	84:3; 84:5; 84:6-10; 107:1-2	This information concerns the processes and functionality of Facebook’s software and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.
Exhibit BB – Excerpts from June 30, 2015 Deposition of Jiakai Liu (Exhibit 9 to Motion to Seal)	Errata 9:23	This information concerns a non-party individual’s personal residential address and is thus entitled to protection under the law.
Exhibit BB – Excerpts from June 30, 2015 Deposition of Jiakai Liu (Exhibit 9 to Motion to Seal)	Errata 94:21; 94:23; 94:25; 197:7; 197:10; 254:1-5	This information concerns the processes and functionality of Facebook’s software and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.
Exhibit CC – Excerpts from September 25, 2015 Deposition of Ray He (Exhibit 11 to Motion to Seal)	56:1-18; 56:20-21; 77:4; 77:6; 77:9-25; 78:1-8; 78:11; 78:13-14; 78:16; 78:18-23; 91:1-4; 91:8-9; 91:12-15; 91:18-20; 91:22-25; 92:2; 92:5-15; 156:1; 156:6-12; 156:18-19; 156:21-25; 157:3-8; 157:10-13; 157:15-18; 157:21-22; 190:4; 190:9-10; 190:12-13; 190:17-19; 190:23-24; 252:3-6; 252:12-14; 252:17; Errata 28:12; Errata 29:5; Errata 30:7; Errata 32:7;	This information concerns the processes and functionality of Facebook’s software and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.

Exhibit	Sealable Portions	Reason for Confidentiality
	Errata 52:25; Errata 53:1; Errata 65:19; Errata 79:19; Errata 92:16; Errata 97:17; Errata 101:8; Errata 102:2; Errata 128:21; Errata 129:11; Errata “throughout”; Errata 163:4; Errata 178:23; Errata 179:12; Errata 197:14; Errata 212:3; Errata 223:9; Errata 251:2,4; Errata 262:23	
Exhibit DD – Excerpts from December 18, 2015 Deposition of Fernando Torres (Exhibit 13 to Motion to Seal)	290:15-17; 290:19-21	This reflects information from Plaintiff Matthew Campbell’s Corrected Objections and Responses to Defendant Facebook, Inc.’s First Set of Interrogatories, which Plaintiffs designated as CONFIDENTIAL pursuant to the Amended Stipulated Protective Order.
Exhibit EE - Excerpts from December 16, 2015 Deposition of Jennifer Golbeck (Exhibit 15 to Motion to Seal)	105:3-355:6	This information includes non-public, confidential, and proprietary information that Facebook designated as HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY pursuant to the Amended Stipulated Protective Order and that was included in Dr. Jennifer Golbeck’s Expert Report in Support of Plaintiffs’ Motion for Class Certification, which was filed under seal by Plaintiffs. (Dkt. 138-6.) This information concerns the internal processes and functionality of Facebook’s messages technology and source code that is protectable as a trade secret or otherwise entitled to protection under the law. It also contains references to Facebook internal discussions regarding the processes and functionality of Facebook’s messages technology and business and engineering decisions that is protectable as a trade secret or otherwise entitled to protection under the law.
Exhibit II – Excerpts from October 28, 2015 Deposition of Ray He (Exhibit 17 to Motion to Seal)	43:6-7; 43:10-11; 43:14; 43:17-22; 43:24-25; 44:1-4; 44:10-16; 44:19-25; 83:5; 83:8-22; 106:1-2; 106:6-11; 106:15;	This information concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.

Exhibit	Sealable Portions	Reason for Confidentiality
	106:17-18; 106:21-23 106:25; Errata 28:14-16; Errata 28:17-24; Errata 28:25; Errata 29:4; Errata 29:9; Errata 30:17; Errata 31:24; Errata 32:7; Errata 32:10; Errata 32:14; Errata 36:34; Errata 37:13; Errata 38:4, 6; Errata 38:12, 14, 15; Errata 39:3; Errata 40:20; Errata 41:5; Errata 41:7; Errata 41:12, 14; Errata 41:19; Errata 42:7; Errata 43:10; Errata 43:18; Errata 44:22; Errata 46:25; Errata 48:13; Errata 48:21; Errata 49:11-14; Errata 49:15, 16; Errata 51:15, 16; Errata 52:16; Errata 54:4, 6; Errata 54:9, 11; Errata 59:19; Errata 58:25; Errata 60:22; Errata 62:10; Errata 62:22; Errata 65:7; Errata 65:9- 10; Errata 65:16; Errata 66:18; Errata 67:1-4; Errata 68:25; Errata 72:4; Errata 74:7; Errata 75:2; Errata 76:15; Errata 78:7; Errata 78:8; Errata 78:19; Errata 79:15; Errata 79:20; Errata 80:2; Errata 80:5; Errata 80:21; Errata 81:19; Errata 83:5; Errata 83:10; Errata 84:5; Errata 88:20; Errata 90:18; Errata 93:23; Errata 96:4; Errata 96:9; Errata 100:24; Errata 102:20; Errata 102:25; Errata 103:14; Errata 106:1; Errata 106:9; Errata 107:7; Errata 107:17; Errata 109:5; Errata 110:7; Errata 110:9	

Exhibit	Sealable Portions	Reason for Confidentiality
Exhibit JJ – Excerpts from October 28, 2015 Deposition of Michael Adkins (Exhibit 19 to Motion to Seal)	45:17-18; 45:24-25; 54:1-17; 75:1; 75:3-25; 76:1-11; 76:18-25; 77:1-6; 77:11-14; 77:16-19; 77:21; 77:24-25; 118:2-8; 118:11; 118:13-20; 118:23-25; 119:1-4; 119:6-25; Errata, Global; Errata, Global; Errata, Global; Errata, 47:21; Errata, 48:20-23; Errata, 76:24	This information concerns the internal processes and functionality of Facebook’s security and anti-abuse products and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.

6. Facebook also moves to seal Exhibits A, B, C, D, L, M, N, O, P, Q, S, T, U, V, FF, GG, HH, KK, and LL to the Chorba Declaration in their entirety for the reasons specified below. Specifically, as identified below, good cause exists to seal Exhibits A, B, C, D, KK, and LL in their entirety because they contain non-public, confidential, and proprietary Facebook business information that Facebook designated as HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY pursuant to the Amended Stipulated Protective Order. The public does not at this time have a meaningful interest in obtaining such information, and public disclosure of this information would cause particularized harm to Facebook by allowing its competitors to access sensitive information, which they could use to gain an unfair advantage against Facebook. Such information could also be used by individuals or companies that might seek to compromise the security of Facebook’s messages technology, causing harm to Facebook and the people who use Facebook’s services. As identified below, Exhibits L, M, N, O, P, Q, S, T, U, V, FF, GG and HH contain or reflect information designated as CONFIDENTIAL or HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY by Plaintiffs pursuant to the Amended Stipulated Protective Order. While Facebook is obligated to submit Exhibits R and W for sealing, Facebook takes no position on whether the information designated by Plaintiffs satisfies the requirements for sealing.

Document to Be Sealed	Reasons for Confidentiality
Exhibit A – Chart: Variability Surrounding Named Plaintiffs and Some Putative Class Members (Exhibit 21 to Motion to Seal)	This document contains deposition testimony of Plaintiff Matthew Campbell, Plaintiff Michael Hurley, Former Plaintiff David Shadpour, and absent putative class members E.H., J.O., and J.W., which was designated as CONFIDENTIAL by

Document to Be Sealed	Reasons for Confidentiality
	Plaintiffs pursuant to the Amended Stipulated Protective Order.
Exhibit B – Graphical Representation of Steps Required to Send and Receive a Facebook Message with a URL Preview Attachment (Exhibit 22 to Motion to Seal)	This document contains detailed technical information about the functionality of Facebook’s messages products and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.
Exhibit C – Graphical Representations of Individualized Inquiries Related to Ascertainability (Exhibit 23 to Motion to Seal)	This document contains detailed technical information about the functionality of Facebook’s messages products and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.
Exhibit D – Charts: Summary of Variability for Challenged Practices (Exhibit 24 to Motion to Seal)	This document contains detailed technical information about the functionality of Facebook’s messages products and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.
Exhibit L – Excerpts from May 9, 2015 Deposition of Matthew Campbell (Exhibit 25 to Motion to Seal)	This deposition testimony was designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.
Exhibit M– Excerpts from July 9, 2015 Deposition of Michael Hurley (Exhibit 26 to Motion to Seal)	This deposition testimony was designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.
Exhibit N – Excerpts from October 1, 2015 Deposition of David Shadpour (Exhibit 27 to Motion to Seal)	This deposition testimony was designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.
Exhibit O – Plaintiff Matthew Campbell’s Corrected Objections and Responses to Defendant Facebook, Inc.’s First Set of Interrogatories (Exhibit 28 to Motion to Seal)	This document was designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.
Exhibit P – Plaintiff Michael Hurley’s Objections and Responses to Defendant Facebook, Inc.’s First Set of Interrogatories (Exhibit 29 to Motion to Seal)	This document was designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.
Exhibit Q – (Former) Plaintiff David Shadpour’s Corrected Objections and Responses to Defendant Facebook, Inc.’s First Set of Interrogatories (Exhibit 30 to Motion to Seal)	This document was designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.
Exhibit S – Plaintiff Matthew Campbell’s Facebook Messages Produced by Plaintiffs (Part 1: CAMPBELL000001 - CAMPBELL000181) (Exhibit 31 to Motion to Seal)	These documents were designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.
Exhibit T – Plaintiff Matthew Campbell’s	These documents were designated as

Document to Be Sealed	Reasons for Confidentiality
1 2 3 Facebook Messages Produced by Plaintiffs (Part 2: CAMPBELL000440 - CAMPBELL000494) (Exhibit 32 to Motion to Seal)	CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.
4 5 6 7 8 Exhibit U – Plaintiff Matthew Campbell’s Facebook Messages Produced by Plaintiffs (Part 3: CAMPBELL000495 - CAMPBELL000496) (Exhibit 33 to Motion to Seal)	These documents were designated as HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY pursuant to the Amended Stipulated Protective Order by Plaintiffs pursuant to the Amended Stipulated Protective Order. Facebook specifically reserve the right to challenge this designation under the Stipulated Protective Order, as well as the sealability of this document under Civil Local Rule 79-5.
9 10 11 12 Exhibit V – Plaintiff Michael Hurley’s Facebook Messages Produced by Plaintiffs (HURLEY000001 - HURLEY000003) (Exhibit 34 to Motion to Seal)	These documents were designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.
13 14 15 16 Exhibit FF – Excerpts from August 7, 2015 Deposition of Absent Putative Class Member E.H. (Exhibit 35 to Motion to Seal)	This deposition testimony was designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.
17 18 19 20 21 22 Exhibit GG – Excerpts from August 10, 2015 Deposition of Absent Putative Class Member J.O. (Exhibit 36 to Motion to Seal)	This deposition testimony was designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.
23 24 25 26 27 28 Exhibit HH – Excerpts from August 11, 2015 Deposition of Absent Putative Class Member J.W. (Exhibit 37 to Motion to Seal)	This deposition testimony was designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.
Exhibit KK– February to March 2011 Facebook Email Chain Produced by Facebook (FB000006429) (Exhibit 38 to Motion to Seal)	This document contains a Facebook internal discussion of business and engineering decisions regarding Facebook’s technology and the internal processes and functionality of Facebook’s messages technology that is entitled to protection under the law.
Exhibits LL – Google Analytics Data Produced by Facebook (FB000009906 and FB000009914) (Exhibit 39 to Motion to Seal)	This is non-public, confidential, and proprietary business metrics and analytics information that is competitively sensitive and that risks particularized harm to Facebook if revealed, and which the public does not have a particular interest in obtaining.

Himel Declaration

7. Good cause exists to seal portions of the Declaration of Alex Himel (Exhibit 40 to the Motion to Seal). Specifically, as identified below, the following portions contain non-public, confidential, and proprietary Facebook business information that Facebook designated as HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY pursuant to the Amended Stipulated Protective

Order. The public does not at this time have a meaningful interest in obtaining such information, and public disclosure of this information would cause particularized harm to Facebook by allowing its competitors to access sensitive information, which they could use to gain an unfair advantage against Facebook. Such information could also be used by individuals or companies that might seek to compromise the security of Facebook’s messages technology, causing harm to Facebook and the people who use Facebook’s services.

Sealable Portions	Reason for Confidentiality
ToC, II; ToC, II.B; ToC, II.C; ToC, III ToC, III.B; ToC, V; ToC, V.B; ToC, V.C; ToC, VI; ToC, VI.B; ToC, VI.C; ToC, VIII; ToC, VIII.B; ToC, VIII.C; 1:8-10; 1:12; 1:24-27; 2:1-2; 2:11; 2:13-14; 2:17-27; 3:1-11; 3:24-25; 3:27; 4:8-10; 4:13; 6:8-9; 6:11-27; 8:1-27; 9:1-27; 10:1-5; 10:8-16; 11:14-23; 11:25-27; 12:1-4; 12:9-19; 12:21-27; 13:1-6; 13:8-9; 13:11-25; 13:27; 14:3-27; 15:1-2; 15:4-5; 15:7-27; 16:1-21; 16:23-27; 17:1-11; 18:1-2; 18:4-15; 18:17-27; 19:1-9; 19:11-12; 19:14-27; 20:1-5; 20:13-27; 21:1-20; 21:22-27; 22:1-10; 22:12-24; 22:27; 23:1-6	This information concerns the internal operations, processes, and functionality of Facebook’s internal tools and software that is protectable as a trade secret or otherwise entitled to protection under the law.
4:16-27; 5:1-27; 6:1-5; 7:1-14; 7:16-27	This information concerns the internal processes and functionality of Facebook’s messaging product and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.

8. Good cause also exists to seal certain portions of Exhibit MM to the Himel Declaration, which are Facebook’s Second Supplemental Responses and Objections to Plaintiffs’ Narrowed Second Set of Interrogatories (Exhibit 42 to the Motion to Seal). Specifically, as identified below, the following portion of Exhibit MM concerns the internal processes and functionality of Facebook’s messages technology that is protectable as a trade secret or otherwise entitled to protection under the law: lines 10:21-18:16. The public does not at this time have a meaningful interest in obtaining such information, and public disclosure of this information would cause particularized harm to Facebook by allowing its competitors to access sensitive information, which they could use to gain an unfair advantage against Facebook. Such information could also be used by

1 individuals or companies that might seek to compromise the security of Facebook’s messages
2 technology, causing harm to Facebook and the people who use Facebook’s services.

3 9. Additionally, Magistrate Judge James previously held that there was good cause to
4 seal certain portions of Exhibit NN to the Himel Declaration, which are Facebook’s Supplemental
5 Responses and Objections to Plaintiffs’ First Set of Interrogatories (Exhibit 44 to the Motion to Seal),
6 as these portions contain “potential trade secrets or otherwise protectable information relating to
7 Facebook’s internal processes and tools that risk particularized harm to Facebook if revealed, and
8 which the public does not at this time have a particular interest in obtaining.” (Dkt. No. 131.)
9 Accordingly, in conformity with Magistrate Judge James’ prior order, good cause exists to seal the
10 following portions of Exhibit NN to the Himel Declaration: lines 3:23-24; 5:24 (the text following
11 “defenses in this action”)-27; 8:9-25; 9:18-11:24; 12:26-16:13; 17:9-20:24; 21:24-25:11; 26:7-29:22;
12 30:23-33:4; 33:27-36:15; 37:15-38:18; 39:15-40:18; 41:15-42:18; 43:13-44:16; 45:16-21; and 46:18-
13 23.

14 10. Good cause exists also exists to seal portions of Exhibit OO to the Himel Declaration,
15 which is the June 1, 2015 Declaration of Alex Himel on Behalf of Defendant Facebook, Inc. (Exhibit
16 46 to the Motion to Seal). Magistrate Judge James previously found that information from this
17 Declaration contains “trade secrets or otherwise protectable information relating to Facebook”’s
18 internal processes and tools that risk particularized harm to Facebook if revealed, and which the
19 public does not at this time have a meaningful interest in obtaining” and should be redacted. (Dkt.
20 No. 131.) For those reasons, good cause exists to seal the following portions of Exhibit C to the
21 Himel Declaration: lines 1:19-24; 2:6; 2:25-26; 3:17-27; 4:1; 4:6-13; 4:16-27; 5:1-5:4; 5:9-14; 5:23-
22 27; 6:1-26; 7:1-2; 7:4-5; 7:8-27; and 8:1-19.

23 **Fechete Declaration**

24 11. Good cause exists to seal portions of the Declaration of Dan Fechete (Exhibit 48 to the
25 Motion to Seal). Specifically, as identified below, the following portions contain non-public,
26 confidential, and proprietary Facebook business information that Facebook hereby designates as
27 HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY pursuant to the Amended Stipulated
28

1 Protective Order. The public does not at this time have a meaningful interest in obtaining such
 2 information, and public disclosure of this information would cause particularized harm to Facebook
 3 by allowing its competitors to access sensitive information, which they could use to gain an unfair
 4 advantage against Facebook. Such information could also be used by individuals or companies that
 5 might seek to compromise the security of Facebook’s technology, causing harm to Facebook and the
 6 people who use Facebook’s services.

Sealable Portions	Reason for Confidentiality
2:1-25; 4:11-23; 4:26-27; 5:1-10:15; 10:18-12:27; 13:14-14:17	This information concerns the internal processes and functionality of Facebook’s Recommendations and Activity Feed features and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.

11 12. Good cause also exists to seal Exhibits PP, QQ, RR, SS, TT, UU, VV, WW, XX, YY,
 12 ZZ, and AAA to the Fechete Declaration in their entirety for the reasons specified below.
 13 Specifically, as identified below, the Exhibits contain non-public, confidential, and proprietary
 14 Facebook business information that Facebook hereby designates as HIGHLY CONFIDENTIAL –
 15 ATTORNEYS’ EYES ONLY pursuant to the Amended Stipulated Protective Order. The public does
 16 not at this time have a meaningful interest in obtaining such information, and public disclosure of this
 17 information would cause particularized harm to Facebook by allowing its competitors to access
 18 sensitive information, which they could use to gain an unfair advantage against Facebook. Such
 19 information could also be used by individuals or companies that might seek to compromise the
 20 security of Facebook’s social plugin technology or user data, causing harm to Facebook and the
 21 people who use Facebook’s services.

Document to be Sealed	Reason for Confidentiality
Exhibit PP – Summary of Relevant Variability in Recommendations Plugin Functionality (Exhibit 50 to Motion to Seal)	This information concerns the internal processes and functionality of Facebook’s internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.
Exhibit QQ – Source Code Differential D94144 (Exhibit 51 to Motion to Seal)	This information concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
Exhibit RR – Source Code Differential D100080 (Exhibit 52 to Motion to Seal)	This information concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.

Document to be Sealed	Reason for Confidentiality
Exhibit SS– Source Code Differential D122427 (Exhibit 53 to Motion to Seal)	This information concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
Exhibit TT – Source Code Differential D121547 (Exhibit 54 to Motion to Seal)	This information concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
Exhibit UU – Source Code Differential D155812 (Exhibit 55 to Motion to Seal)	This information concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
Exhibit VV – Source Code Differential D179234 (Exhibit 56 to Motion to Seal)	This information concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
Exhibit WW – Source Code Differential D186382 (Exhibit 57 to Motion to Seal)	This information concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
Exhibit XX – Source Code Differential D211615 (Exhibit 58 to Motion to Seal)	This information concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
Exhibit YY – Source Code Differential D236924 (Exhibit 59 to Motion to Seal)	This information concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
Exhibit ZZ – Source Code Differential D172147 (Exhibit 60 to Motion to Seal)	This information concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
Exhibit AAA – Source Code Differential D404158 (Exhibit 61 to Motion to Seal)	This information concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.

Adkins Declaration

13. Good cause exists to seal portions of the Declaration of Michael Adkins (Exhibit 62 to the Motion to Seal). Specifically, as identified below, the following portions contain non-public, confidential, and proprietary Facebook business information that Facebook designated as HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY pursuant to the Amended Stipulated Protective Order. The public does not at this time have a meaningful interest in obtaining such information, and public disclosure of this information would cause particularized harm to Facebook by allowing its competitors to access sensitive information, which they could use to gain an unfair advantage against Facebook. Such information could also be used by individuals or companies that might seek to compromise the security of Facebook’s messages technology, causing harm to Facebook and the people who use Facebook’s services.

Sealable Portions	Reason for Confidentiality
1:7; 1:11; 1:14-17; 1:21; 1:24; 1:27; 2:3-5; 2:6; 2:11; 2:15; 2:16; 2:17-22; 2:23-27; 3:2-3; 3:7-8; 3:9; 3:10; 3:11-12; 3:12-13; 3:14-15; 3:16; 3:18-19; 3:20-22; 3:24-27; 4:1-2; 4:3-6; 4:6-7; 4:7; 4:8-9; 4:10-11; 4:13-14; 5:1-3; 5:3-5; 5:13-14; 5:18; 5:19-22; 5:22-23; 5:25-27; 6:1; 6:9-12; 6:13-16; 6:18-19; 6:21-27; 7:1; 7:2; 7:3; 7:4; 7:5-6; 7:7-8; 7:9-11; 7:14-16; 7:17-19; 7:24-26; 8:8-10; 8:11-15; 8:17-21	This information concerns the internal processes and functionality of Facebook’s security and anti-abuse products and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.
1:19; 1:20; 3:4-7; 4:20; 5:15-17; 7:23-24	This information concerns the internal processes and functionality of Facebook’s internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.
3:8-9; 4:16-18; 4:19; 4:21-27	This information concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law, the release of which would cause competitive harm to Facebook and compromise the security of Facebook’s messages technology, causing harm to Facebook and people who use Facebook’s products.

The Goldberg Report

14. Good cause exists to seal portions of the Goldberg Report (Exhibit 64 to the Motion to Seal). Specifically, as identified below, the following portions contain non-public, confidential, and proprietary Facebook business information that Facebook designated as HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY pursuant to the Amended Stipulated Protective Order. The public does not at this time have a meaningful interest in obtaining such information, and public disclosure of this information would cause particularized harm to Facebook by allowing its competitors to access sensitive information, which they could use to gain an unfair advantage against Facebook. Such information could also be used by individuals or companies that might seek to compromise the security of Facebook’s messages technology, causing harm to Facebook and the people who use Facebook’s services.

Sealable Portions	Reason for Confidentiality
ToC, VII. A; ToC, VII. B; ToC, VIII. A.1; ToC,	This information concerns the internal operations, processes, and functionality of Facebook’s internal tools and software that is

Sealable Portions	Reason for Confidentiality
VIII. A.2; ToC, VIII. A.3	protectable as a trade secret or otherwise entitled to protection under the law.
¶¶ 8-11, 13	This information concerns the internal operations, processes, and functionality of Facebook’s internal tools and software that is protectable as a trade secret or otherwise entitled to protection under the law.
¶ 14 and fn. 1	This information concerns the functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
¶ 15	This information concerns the internal processes and functionality of Facebook’s messaging product and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.
¶ 16	This information concerns the internal operations, processes, and functionality of Facebook’s internal tools and software that is protectable as a trade secret or otherwise entitled to protection under the law.
¶¶ 28-30, VII.A, ¶ 31	This information concerns the internal processes and functionality of Facebook’s messaging product and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.
¶ 32	This information concerns the internal operations, processes, and functionality of Facebook’s internal tools and software that is protectable as a trade secret or otherwise entitled to protection under the law.
¶¶ 33-36	This information concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law, the release of which would cause competitive harm to Facebook and compromise the security of Facebook’s messages technology, causing harm to Facebook and people who use Facebook’s products.
¶¶ 37-38	This information concerns the internal operations, processes, and functionality of Facebook’s internal tools and software that is protectable as a trade secret or otherwise entitled to protection under the law.
¶ 39	This information concerns the internal processes and functionality of Facebook’s messaging product and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.
¶¶ 40-41	This information concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law, the release of which would cause competitive harm to Facebook and compromise the security of Facebook’s messages technology, causing harm to Facebook and people who use Facebook’s products.
¶ 42	This information concerns the internal operations, processes, and functionality of Facebook’s internal tools and software that is protectable as a trade secret or otherwise entitled to protection under the law.

Sealable Portions	Reason for Confidentiality
VII.B	This information concerns the internal processes and functionality of Facebook’s messaging product and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.
¶¶ 43-44	This information concerns the internal operations, processes, and functionality of Facebook’s internal tools and software that is protectable as a trade secret or otherwise entitled to protection under the law.
¶¶ 45-46	This information concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law, the release of which would cause competitive harm to Facebook and compromise the security of Facebook’s messages technology, causing harm to Facebook and people who use Facebook’s products.
VII.B.1	This information concerns the internal processes and functionality of Facebook’s messaging product and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.
¶ 49 and n.3	This information concerns the internal operations, processes, and functionality of Facebook’s internal tools and software that is protectable as a trade secret or otherwise entitled to protection under the law.
¶ 50 and n.4	This information concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law, the release of which would cause competitive harm to Facebook and compromise the security of Facebook’s messages technology, causing harm to Facebook and people who use Facebook’s products.
¶ 51	This information concerns the internal processes and functionality of Facebook’s messaging product and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.
¶ 52	This information concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law, the release of which would cause competitive harm to Facebook and compromise the security of Facebook’s messages technology, causing harm to Facebook and people who use Facebook’s products.
¶¶ 53, 54, VII.B.2, ¶ 55, ¶ 56, ¶ 57, VII.B.3, ¶ 58	This information concerns the internal operations, processes, and functionality of Facebook’s internal tools and software that is protectable as a trade secret or otherwise entitled to protection under the law.
¶ 60	This information concerns the internal processes and functionality of Facebook’s messaging product, security and anti-abuse products, and source code, all of which are protectable as a trade secret or otherwise entitled to protection under the law, the release of which would cause competitive harm to Facebook and compromise the security of Facebook’s messages technology, causing harm to Facebook and people who use Facebook’s products.

Sealable Portions	Reason for Confidentiality
¶¶ 61, 62, 63, 66	This information concerns the internal operations, processes, and functionality of Facebook’s internal tools and software that is protectable as a trade secret or otherwise entitled to protection under the law.
¶ 68 and n. 6, ¶ 69	This information concerns the internal processes and functionality of Facebook’s messaging product and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.
¶ 71	This information concerns the internal processes and functionality of Facebook’s security and anti-abuse products and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.
¶¶ 72, 73	This information concerns the internal processes and functionality of Facebook’s messaging product and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.
¶¶ 75, 79, 80-87	This information concerns the internal operations, processes, and functionality of Facebook’s internal tools and software that is protectable as a trade secret or otherwise entitled to protection under the law.
VIII.F, ¶ 88	This information concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law, the release of which would cause competitive harm to Facebook and compromise the security of Facebook’s messages technology, causing harm to Facebook and people who use Facebook’s products.
¶¶ 93, 96-99	This information concerns the internal processes and functionality of Facebook’s messaging product and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.
¶ 101	This information concerns the internal operations, processes, and functionality of Facebook’s internal tools and software that is protectable as a trade secret or otherwise entitled to protection under the law.
¶ 102	This information concerns the internal processes and functionality of Facebook’s security and anti-abuse products and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.
¶¶ 103-104	This information concerns the internal operations, processes, and functionality of Facebook’s internal tools and software that is protectable as a trade secret or otherwise entitled to protection under the law.

The Tucker Report

15. Facebook also moves to seal certain portions of the Tucker Report (Exhibit 66 to the Motion to Seal). Specifically, as identified below, portions of the Tucker Report contain non-public, confidential, and proprietary Facebook business information that Facebook designated as HIGHLY

1 CONFIDENTIAL – ATTORNEYS’ EYES ONLY pursuant to the Amended Stipulated Protective
 2 Order. The public does not at this time have a meaningful interest in obtaining such information, and
 3 public disclosure of this information would cause particularized harm to Facebook by allowing its
 4 competitors to access sensitive information, which they could use to gain an unfair advantage against
 5 Facebook. Such information could also be used by individuals or companies that might seek to
 6 compromise the security of Facebook’s messages technology, causing harm to Facebook and the
 7 people who use Facebook’s services. As identified below, the Tucker Report also contains
 8 information designated by Plaintiffs as CONFIDENTIAL pursuant to the Amended Stipulated
 9 Protective Order. While Facebook is obligated to submit this information for sealing, Facebook takes
 10 no position on whether the information designated by Plaintiffs satisfies the requirements for sealing.

Sealable Portions	Reason for Confidentiality
4, n.3	This reflects information provided in the January 15, 2016 Declaration of Alex Himel that concerns the internal operations, processes, and functionality of Facebook’s internal tools and software that is protectable as a trade secret or otherwise entitled to protection under the law.
5, n.4	This reflects information in the Expert Report of Jennifer Golbeck that concerns the processes and functionality of Facebook’s source code that is protectable as a trade secret or otherwise entitled to protection under the law.
6, n.5; 22, ¶ 51	This reflects information in the Fehete Declaration referenced above that concerns the internal processes and functionality of Facebook’s Recommendations and Activity Feed features and internal tools that is protectable as a trade secret or otherwise entitled to protection under the law.
6, n.6; 14, ¶ 34, lines 1-2; 14, n.26; 17, ¶ 40	This reflects information in the Himel Declaration referenced above that concerns the internal operations, processes, and functionality of Facebook’s internal tools and software that is protectable as a trade secret or otherwise entitled to protection under the law.
11, ¶ 32; 12 (figure); 12, ¶ 33; 13 (figure); 14, ¶ 34, lines 3-6; 14, n.25, 14, n.27; 16, n.32; 18, ¶ 45-19, line 2; 19, line 4; 19, n.39; 19, n.40; 20, ¶ 48-21, line 4; 21, n.43; 23, ¶ 54; 29, ¶ 70; 29 ¶ 71; 30, figure; 31, figure; 45, lines 7-10; 53, ¶ 121	This reflects information regarding Plaintiff Matthew Campbell’s messages, which was designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.
14, ¶ 35	This reflects information in the Himel Declaration and the Fehete

Sealable Portions	Reason for Confidentiality
	Declaration referenced above that concerns the internal operations, processes, and functionality of Facebook’s internal tools and software that is protectable as a trade secret or otherwise entitled to protection under the law.
16, n.33; 36, lines 2-3; 52, n.144	This includes non-public, confidential, and proprietary information that Facebook designated as HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY pursuant to the Amended Stipulated Protective Order and that was referenced during the deposition of Dr. Jennifer Golbeck and that was included in Dr. Jennifer Golbeck’s Expert Report in Support of Plaintiffs’ Motion for Class Certification, which was filed under seal by Plaintiffs. (Dkt. 138-6.) This information concerns the internal processes and functionality of Facebook’s messages technology and source code that is protectable as a trade secret or otherwise entitled to protection under the law.
22, ¶ 52; 23, figure; 22, ¶ 53; 45, lines 6-7; 45, n.119	This reflects information regarding Plaintiff Matthew Hurley’s messages, which was designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.
23, n.46; 24, ¶ 56; 24, ¶ 57; 24, n.54; 24, n.55; 24, n.56	This reflects information from the depositions of Former Plaintiff David Shadpour, Plaintiff Michael Hurley, Plaintiff Matthew Campbell, and absent putative class members E.H., J.O., and J.W. , the transcripts of which were designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order .
25, ¶ 59	This reflects information from the deposition of Plaintiff Matthew Campbell, the transcript of which was designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.
32, ¶ 72; 31, n.64; 31, n.65	This reflects information regarding Plaintiff Matthew Campbell’s and Plaintiff Michael Hurley’s messages, which was designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.

Appendix of Evidence

16. Facebook also moves to seal a portion of the Appendix of Evidence. The portion identified below contain or reflect information designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order. While Facebook is obligated to submit this information for sealing, Facebook takes no position on whether the information designated by Plaintiffs satisfies the requirements for sealing.

Sealable Portions	Reason for Confidentiality
Index 2:16-19	This reflects information identifying absent putative class members, whose identities have been designated as CONFIDENTIAL by Plaintiffs pursuant to the Amended Stipulated Protective Order.

1 **ATTORNEY ATTESTATION**

2 I, Christopher Chorba, attest that concurrence in the filing of this Declaration of Nikki Stitt
3 Sokol has been obtained from the signatory. I declare under penalty of perjury under the laws of the
4 United States of America that the foregoing is true and correct. Executed this 22nd day of January
5 2016, in Los Angeles, California.

6
7 Dated: January 22, 2016

8 */s/ Christopher Chorba*
9 Christopher Chorba