

EXHIBIT 6

**REDACTED VERSION OF DOCUMENT(S)
SOUGHT TO BE SEALED**

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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.
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Case No. C 13-05996 PJH

PUTATIVE CLASS ACTION

**DECLARATION OF DALE HARRISON IN
SUPPORT OF DEFENDANT FACEBOOK,
INC.'S OBJECTION TO AND REQUEST
TO STRIKE NEW EVIDENCE AND
MISSTATEMENTS OF FACT
CONTAINED IN PLAINTIFFS' REPLY IN
SUPPORT OF THEIR MOTION FOR
CLASS CERTIFICATION**

1 I, Dale Harrison, declare as follows:

2 1. I have been employed as a software engineer at Facebook since August 2014, and my
3 current title is Engineering Manager. I am over the age of 18. I have personal knowledge of the
4 matters stated herein and, if called as a witness, could and would testify competently thereto.

5 2. I provide this Declaration in support of Facebook’s Objection to New Evidence in
6 Plaintiffs’ Reply In Support of Motion for Class Certification in order to address some of the new
7 assertions in the new Report of Dr. Jennifer Golbeck in Support of Plaintiffs’ Motion for Class
8 Certification (dated February 19, 2016 (Dkt. 166-7 and Dkt. 167-1, Ex. 1)), specifically with regard
9 to her new proposed query for ascertaining purported class members.

10 **Dr. Golbeck’s New Proposal to Identify Class Members**

11 3. I understand that Dr. Golbeck is now proposing that [REDACTED]
12 [REDACTED] could be written that would identify the senders and recipients of
13 Private Messages sent during the Class Period with URL attachments [REDACTED]
14 [REDACTED] (Dkt. 166-7, ¶ 9.) This is incorrect, and Dr. Golbeck’s proposed query appears to
15 rely on several incorrect assumptions.

16 4. First, contrary to the suggestion in Dr. Golbeck’s report, there is no single “[REDACTED]
17 database” that can be directly queried for “[REDACTED].” Instead, “[REDACTED] is the internal name for
18 the Messages system comprising an underlying set of databases (known as “Hbase”) and a set of
19 application servers, which (among other things) are used to process data to and from the underlying
20 databases. Hbase is the permanent storage for records of each action taken in connection with
21 Messages, such as sending, deleting, reading, or otherwise acting on a message. Roughly [REDACTED]
22 [REDACTED] every day. Therefore, since the beginning of the class period (December 30,
23 2011), there may have been more than [REDACTED]
24 [REDACTED] in the way that Dr. Golbeck assumes.

25 5. Second, [REDACTED] to identify those records that
26 correspond to message sends (as opposed to other message actions). [REDACTED]
27 [REDACTED].

1 [REDACTED]
2 [REDACTED]. To my
3 knowledge, such a query has never been attempted. The only effort of which I am aware that
4 required [REDACTED]
5 [REDACTED]
6 [REDACTED]. If a person could write
7 code that would be able to [REDACTED]
8 [REDACTED]—and I do not know if
9 this is even possible, as it never has been attempted before—the search process may likewise take [REDACTED]
10 [REDACTED]
11 [REDACTED]. Again, there is no certainty that such a process could even complete
12 successfully; as with any extremely large, distributed system, Facebook incurs hardware failures,
13 upgrades or reductions in capacity, and other similar issues all the time. Moreover, Facebook’s
14 efforts to operate its service in the meantime would likely result in interruptions and other errors that
15 could prevent the code from completing and/or producing reliable results.

16 6. Third, even if Facebook could generate a list of “[REDACTED]” over a five-year
17 period, Dr. Golbeck is incorrect that her proposed query would isolate messages that contained URL
18 attachments. An attachment can be one of a number of types, such as a video, a photo, a URL, or a
19 sticker, among other things. Therefore, identifying all messages with “[REDACTED]” or attachments—
20 even if it were possible—would not be the same thing as identifying messages that contained URL
21 attachments (which I understand would be necessary to identify putative class members). Without
22 actually examining the content of each [REDACTED], it would not be possible to know which of these
23 types of attachments it represented. As noted, a particular [REDACTED] could represent many other types
24 of attachments in addition to a URL.

25 7. There are several additional problems with Dr. Golbeck’s proposed query. The
26 following is a non-exhaustive list:

- 27 • Facebook’s method of storing and representing data about messages and their

