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 13

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

17 MATTHEW CAMPBELL and MICHAEL  
 HURLEY,

18 Plaintiffs,  
 19

20 v.

21 FACEBOOK, INC.,

22 Defendant.  
 23

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**

24  
 25 REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED  
 26  
 27  
 28

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  
28



**ATTORNEY ATTESTATION**

I, Christopher Chorba, attest that concurrence in the filing of this Declaration of Dale Harrison 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 26th day of February, 2016, in Los Angeles, California.

Dated: February 26, 2016

\_\_\_\_\_  
*/s/ Christopher Chorba*  
Christopher Chorba