

EXHIBIT A

Exhibit B
Variability Surrounding Named Plaintiffs and Some Putative Class Members
Campbell, et al. v. Facebook, Inc.

	Matthew Campbell	Michael Hurley	David Shadpour	[REDACTED]	[REDACTED]	[REDACTED]
Read implied consent sources?	Yes [Tr. at 267:13-271:16.]	Yes [Tr. at 179:9-184:4.]	Possibly [Tr. at 36:9-37:10.]	No [Tr. at 191:12-192:7.]	Yes [Tr. at 158:10-162:1.]	Yes [Tr. at 253:2-257:9.]
Read Facebook developer guidance?	No [Tr. at 250:20-22.]	No [Tr. at 184:8-14.]	Unknown [Tr. at 146:24-147:8.]	No [Tr. at 119:1-10.]	Yes [Tr. at 39:8-23.]	No [Tr. at 150:3-8.]
Use JavaScript?	Yes and No [Tr. at 221:4-222:6.]	Unknown [Tr. at 110:2-18.]	Unknown [Tr. at 128:8-23.]	Unknown [Tr. at 152:6-15.]	Yes [Tr. at 126:17-127:4.]	Yes [Tr. at 188:7-189:16.]
See URL previews before sending?	Yes [Tr. at 164:3-18.]	Yes [Tr. at 103:20-23.]	Yes [Tr. at 105:21-25.]	Unknown [Tr. at 150:1-152:5.]	Yes [Tr. at 121:13-122:4.]	Yes [Tr. at 147:17-23.]
Delete URL previews?	Unknown [Tr. at 164:3-18.]	No [Tr. at 106:7-11.]	No [Tr. at 128:1-3.]	Unknown [Tr. at 150:1-152:5.]	Unknown [Tr. at 122:22-132:18.]	No [Tr. at 185:8-186:7.]
Did the people with whom they exchanged messages consent?	Unknown [Tr. at 230:2-7; 232:6-10; 225:23-226:1; 254:19-255:12; 256:3-16; 256:17-258:8; 251:24-252:23.]	Unknown [Tr. at 112:16-20; 117:15-118:15; 120:14-121:7; 124:25-125:18; 129:2-131:23; 133:12-134:10; 136:18-138:9.]	Unknown [Tr. at 147:9-148:1.]	Unknown [Tr. at 164:25-166:2.]	Unknown [Tr. at 132:17-134:23.]	Unknown [Tr. at 230:7-231:2; 211:5-12; 217:20-219:22.]
Continue to send messages with URLs even after filing suit / receiving subpoena?	Yes [Tr. at 71:24-72:18.]	No [Tr. at 36:19-23.]	Yes [Tr. at 90:1-9.]	Yes [Tr. at 84:19-25; 170:14-24.]	Yes [Tr. at 101:7-14; 156:21-157:3.]	Yes [Tr. at 136:11-137:18.]
Any basis to claim that Facebook incremented “Like” count based on messages?	No [Tr. at 224:9-18; 189:22-190:2.]	No [Tr. at 110:23-111:4; 153:15-19; 64:5-23.]	No [Tr. at 130:17-20.]	No [Tr. at 119:11-16; 155:12-15.]	No [Tr. at 127:20-24; 128:21-25; 129:7-15.]	No [Tr. at 194:1-6; 202:18-203:6.]
Any basis to claim that Facebook sent targeted advertising based on messages?	No [Tr. at 201:11-22; 203:8-12.]	No [Tr. at 163:5-10; 148:6-9; 161:19-25.]	No [Tr. at 106:1-10; 130:21-2.]	No [Tr. at 185:11-18.]	No [Tr. at 158:6-9.]	No [Tr. at 251:13-253:1.]
Whether they suffered “financial harm”?	No [Tr. at 192:11-14; 62:19-63:9.]	No [Tr. at 153:20-24.]	No [Tr. at 41:25-42:13.]	Unknown [Tr. at 171:2-8.]	Unknown [Tr. at 157:10-158:1.]	No [Tr. at 248:11-249:21.]

	Matthew Campbell	Michael Hurley	David Shadpour	██████████	██████████	██████████
Level of “processing” of messages by Facebook to which they object?	<p>Objects to “processing” for “any purpose” [Tr. at 169:12-178:2.]</p>	<p>Objects to “processing” for any purpose “not necessary to send the message” [Tr. at 189:22-190:17.]</p>	<p>Objects to incrementing “Like” count and serving targeted advertising (but does <i>not</i> object to rendering URL previews; delivering, filtering, storing, rendering, or formatting messages; or blocking malware, viruses, spam, or child exploitation images) [Tr. at 94:22-10-105:18.]</p>	<p>Unknown [Tr. at 140:24-142:20.]</p>	<p>Objects to incrementing “Like” count and serving targeted advertising (but does <i>not</i> object to rendering URL previews; delivering, filtering, storing, rendering, or formatting messages; detecting sexual predators; or blocking malware, viruses, spam, or child exploitation images [Tr. at 108:10-114:5.]</p>	<p>Objects to anything that “goes beyond basic delivery functions” [Tr. at 154:13-157:4.]</p>
Exhibit Number for Deposition Transcript	Exhibit L	Exhibit M	Exhibit N	Exhibit FF	Exhibit GG	Exhibit HH