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United States District Court

Northern District of California

DAVID SHADPOUR, on behalf of himself
 and all others similarly situated,

Plaintiffs,

v.

FACEBOOK, INC.,

Defendant.

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Case No. 14-CV-00307-PJH

**DECLARATION OF JEREMY A.
 LIEBERMAN IN SUPPORT OF
 PLAINTIFFS' MOTION TO
 CONSOLIDATE RELATED ACTIONS
 AND APPOINT INTERIM COUNSEL**

Judge: Honorable Phyllis J. Hamilton

{00125820;1 }

1 I, Jeremy A. Lieberman, declare as follows:

2 1. I am a partner with the law firm Pomerantz, LLP (“Pomerantz”), and I am one of
3 the attorneys of record for Plaintiff David Shadpour (“Plaintiff”). This Declaration is based upon
4 my personal knowledge and is made in support of Plaintiff’s Motion to Consolidate Related
5 Actions and Appoint Interim Counsel. If called as a witness to this matter, I could truthfully and
6 competently testify as to all matters stated herein.

7 2. My firm has substantial experience in litigating class actions and similarly
8 complex matters, which includes serving in numerous leadership positions and securing hundreds
9 of millions of dollars in benefits for class members. Attached hereto as Exhibit A is a true and
10 correct copy of my firm’s resume, which provides details of my firm’s practice and achievements,
11 particularly in the class action context.

12 3. On December 30, 2013, the law firms of Carney, Bates and Pulliam, PLLC
13 (“CBP”) and Lieff, Cabraser, Heimann & Bernstein, LLP (“LCHB”, and collectively referred to
14 with Pomerantz and CBP as “Proposed Plaintiffs’ Executive Committee”) caused a complaint to
15 be filed on behalf of Plaintiffs Campbell and Hurley, and all others similarly situated, against
16 Defendant Facebook (“Facebook”), alleging violations of federal and state law based on
17 Defendant’s practice of scanning its users’ private messages, which is styled *Campbell et al. v.*
18 *Facebook, Inc.*, No. 13-CV-05996 (N.D. Cal.).

19 4. Prior to filing Plaintiff Shadpour’s initial complaint, my firm investigated and
20 researched all potential claims in this action. Based on this research and investigation, on January
21 21, 2014, Pomerantz caused a complaint to be filed on behalf of Plaintiff Shadpour, and all others
22 similarly situated, against Defendant Facebook, Inc. (“Facebook”), alleging violations of federal
23 and state law based on Defendant’s practice of scanning its users’ private messages, which is
24 styled *Shadpour et al. v. Facebook, Inc.*, No. 14-CV-0307 (N.D. Cal.).

25 5. Proposed Plaintiffs’ Executive Committee has worked cooperatively in this case in
26 prosecuting the above-entitled actions (the “Related Actions”). The Related Actions are
27 predicated on substantially similar factual allegations, and they assert the same state law claims.
28 As such, it is Pomerantz’s belief that consolidation will save the Court and the parties

1 considerable time and expense. It is further Pomerantz's belief that the efficient and ordered
2 management of the consolidated actions may be achieved by appointment of the Proposed
3 Plaintiffs' Executive Committee.

4 6. In sum, as reflected by my firm's resume and their efforts to date in this action,
5 Pomerantz consists of attorneys who are well-versed, experienced, and dedicated to prosecuting
6 the claims alleged against Defendant in the best interests of all plaintiffs and the proposed Class.
7 Moreover, Pomerantz can, and will, contribute all necessary resources to this litigation, as well as
8 work cooperatively with other Plaintiffs' counsel and draw from their resources when
9 appropriate.

10 I declare under the penalty of perjury under the laws of the United States of America that
11 the foregoing is true and accurate.

12 Executed this 21st day of March, 2014 in New York, NY.

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14 /s/ Jeremy A. Lieberman
15 Jeremy A. Lieberman, Esq.
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