

EXHIBIT 10

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

_____)
MATTHEW CAMPBELL, MICHAEL)
HURLEY, and DAVID SHADPOUR, on)
behalf of themselves and all)
others similarly situated,)
Plaintiffs,)
vs.) Case No.
FACEBOOK, INC.,) C 13-05996 PJH
Defendant.) Volume I
_____)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Videotaped Deposition of FERNANDO TORRES,
taken on behalf of Defendant, at the offices of
Lieff, Cabraser, Heimann & Bernstein, 275 Battery
Street, San Francisco, California, beginning at
8:10 a.m. and ending at 4:42 p.m., on Friday,
December 18, 2015, before Chris Te Selle, CSR
No. 10836.

Job No. 2194240

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1 or formulaic method that you developed? 10:01:22

2 MR. DIAMAND: Objection.

3 THE WITNESS: So, I applied established

4 valuation methodologies to value the social graph,

5 and then established a method to attribute an 10:01:40

6 increase of the value of that asset as a result of

7 an increase in the number of edges within the social

8 graph, derived from the intercepted messages.

9 BY MR. CHORBA:

10 Q. And do you have a section of your report 10:02:20

11 that's focused on that methodology?

12 A. Well, I think it's all of section 4.

13 Q. Combined, or 4 A?

14 A. Well, 4 A deals more directly with it,

15 yes. 10:02:39

16 Q. If you look at page 22, paragraph 60, and

17 that's at the end of section 4 A of your report, and

18 I will just read it. Therefore, it is my opinion

19 that a proper attribution of damages among plaintiff

20 class members, as calculated, excuse me, calculated 10:03:50

21 as benefits received by the defendant, should be

22 based on the number of links, paren, URLs, close

23 paren, intercepted.

24 Is that your ultimate conclusion in

25 paragraph or in section 4 A of your opinion? 10:04:09

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

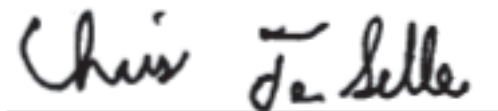
4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were duly sworn; that a record
8 of the proceedings was made by me using machine
9 shorthand which was thereafter transcribed under my
10 direction; that the foregoing transcript is a true
11 record of the testimony given.

12 Further, that if the foregoing pertains to the
13 original transcript of a deposition in a Federal
14 Case, before completion of the proceedings, review
15 of the transcript [X] was [] was not requested.

16 I further certify I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or party to this action.

19 IN WITNESS WHEREOF, I have this date subscribed
20 my name.

21 Dated: 1/5/2016

22
23 

24 CHRIS TE SELLE

25 CSR No. 10836