

EXHIBIT 11

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MATTHEW W. CAMPBELL and)
MICHAEL HURLEY, on behalf)
of themselves and all)
others similarly situated,)
Plaintiffs,) Civil Action No.
) 4:13-cv-05996-PJH
vs.)
)
FACEBOOK, INC.,)
Defendant.)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF DR. CATHERINE TUCKER,
called as a witness on behalf of the Plaintiffs,
pursuant to the applicable provisions of
the Federal Rules of Civil Procedure,
before Jeanette N. Maracas, Registered
Professional Reporter and Notary
Public in and for the Commonwealth of
Massachusetts, at the Offices of Analysis
Group, 111 Huntington Avenue, Boston,
Massachusetts, on Tuesday, January 26, 2016,
commencing at 11:05 a.m.

Job No. 2221467

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1 as it does to assets? I assume it does,
2 but...

3 A. So my testimony, as in this report, relates
4 to the fundamentals affecting why I think
5 that Mr. Torres's approach to valuation is
6 not -- has flaws.

7 Q. I understand, but I probably wasn't clear.
8 In a professional context, have you ever been
9 retained to value an intangible asset?

10 MR. CHORBA: Asked and answered.

11 A. So I have provided testimony relating to the
12 valuation of IP, but I have not actually gone
13 and valued it.

14 Q. And that's -- and have you done that -- have
15 you done that in any context, academic,
16 professional or otherwise, valued an
17 intangible asset?

18 A. Actually gone out and built an Excel
19 spreadsheet? No. As I say, that would be
20 not -- that's something that you would employ
21 someone else to do.

22 Q. Understand. I'm not -- I understand. I want
23 to turn to Paragraph 94 on Page 41 in which
24 you write about Mr. Torres's work and
25 research and development costs specifically.

1 included. And if we were, indeed, to include
2 them, then that would change his valuation.

3 Q. But is it your testimony that one should
4 always include those R&D expenses in the way
5 that you set out in your report?

6 MR. CHORBA: Objection, misstates
7 her testimony.

8 A. So I am -- I think you are attributing to me
9 a slightly stronger opinion than I have
10 because all I'm saying is that there is at
11 least a question mark for me over Mr.
12 Torres's claim that it is an accepted
13 valuation practice to exclude research and
14 development expenditures.

15 Now, as you know, even before we get
16 to this more detail-oriented point, there's a
17 lot of issues I have with it before we get
18 here, but it does seem to me that there is a
19 question mark over whether or not research
20 and development expenses should be included.

21 Q. Just to round this off, other than the
22 textbook that you cite to in Footnote 103, do
23 you have any other source for this statement
24 or any personal expertise to support this
25 statement?

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COMMONWEALTH OF MASSACHUSETTS)
SUFFOLK, SS.)

I, Jeanette Maracas, Registered Professional Reporter and Notary Public in and for the Commonwealth of Massachusetts, do hereby certify that there came before me on the 26th day of January, 2016, at 11:05 a.m., the person hereinbefore named, who was by me duly sworn to testify to the truth and nothing but the truth of his knowledge touching and concerning the matters in controversy in this cause; that he was thereupon examined upon his oath, and his examination reduced to typewriting under my direction; and that the deposition is a true record of the testimony given by the witness.

I further certify that I am neither attorney or counsel for, nor related to or employed by, any attorney or counsel employed by the parties hereto or financially interested in the action.

In witness whereof, I have hereunto set my hand this 4th day of February, 2016.

<%signature%>
Notary Public
My commission expires 8/14/20