

EXHIBIT Q

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18 *Attorneys for Plaintiffs and the Proposed Class*

20 UNITED STATES DISTRICT COURT
21 NORTHERN DISTRICT OF CALIFORNIA
22 OAKLAND DIVISION

23 MATTHEW CAMPBELL, MICHAEL
24 HURLEY, and DAVID SHADPOUR,

25 Plaintiffs,

26 v.

27 FACEBOOK, INC.,

28 Defendant.

Case No. C 13-05996 PJH

**PLAINTIFF DAVID SHADPOUR’S
CORRECTED OBJECTIONS AND
RESPONSES TO DEFENDANT
FACEBOOK, INC.’S FIRST SET OF
INTERROGATORIES**

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1 PROPOUNDING PARTY: FACEBOOK, INC.

2 RESPONDING PARTY: DAVID SHADPOUR, on behalf of himself and all
3 others similarly situated

4 SET NO.: ONE (1)

5 Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff David
6 Shadpour hereby serves his corrected objections and responses to Defendant Facebook Inc.’s First
7 Set of Interrogatories (“Interrogatories”). These responses are designated “Highly Confidential –
8 Attorneys’ Eyes Only” under the terms of the draft of the Stipulated Protective Order sent by
9 Plaintiffs to Defendant on March 11, 2015.

GENERAL OBJECTIONS

12 1. Plaintiff objects to each of Defendant’s Interrogatories to the extent that they,
13 individually or cumulatively, purport to impose on Plaintiff duties and obligations which exceed,
14 or are different, than those imposed on him by the Federal Rules of Civil Procedure or the Local
15 Rules of the Court.

16 2. Plaintiff generally objects to each Interrogatory to the extent it purports to seek
17 information covered by the attorney-client privilege, the work product privilege, or any other
18 applicable privilege or immunity. Plaintiff further objects to each Interrogatory to the extent that
19 it seeks information prepared in anticipation of litigation or for trial of this or any matter.
20 Plaintiff will provide any information that he believes is non-privileged and is otherwise properly
21 discoverable. By providing such information, Plaintiff does not waive any privileges. To the
22 extent that an Interrogatory may be construed as seeking such privileged or protected information
23 or documents, Plaintiff hereby claims such privilege and invokes such protection. The fact that
24 Plaintiff does not specifically object to an individual Interrogatory on the ground that it seeks
25 such privileged or protected information shall not be deemed a waiver of the protection afforded
26 by the attorney-client privilege, the attorney work product doctrine, or any other applicable
27 privilege or protection.

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1 3. Plaintiff and Plaintiff’s counsel have not completed their investigation of the facts
2 related to this case and have not completed their preparation for trial. Thus, the following
3 responses are based on discovery and investigations that are ongoing and not yet complete.
4 Plaintiff reserves the right to update, amend or supplement these responses. These responses are
5 made without prejudice to Plaintiff’s right to utilize subsequently discovered evidence at trial or
6 in connection with pretrial proceedings, or to amend these responses in the event that any
7 information is subsequently acquired or learned by Plaintiff or inadvertently omitted in these
8 responses.

9 4. Plaintiff generally objects to each Interrogatory to the extent that it is vague and/or
10 ambiguous. Where possible, however, Plaintiff will make reasonable assumptions as to
11 Defendant’s intended meaning and will respond accordingly, while preserving his objections as to
12 vagueness, ambiguity, and uncertainty.

13 5. Plaintiff objects to each Interrogatory or Instruction which seeks information that
14 is neither relevant nor material to the subject matter of this action, nor reasonably calculated to
15 lead to the discovery of admissible evidence.

16 6. Plaintiff objects to each Interrogatory which seeks identification of facts not in
17 Plaintiff’s possession, custody or control.

18 7. Plaintiff objects to each Interrogatory to the extent it requires the production of
19 information already produced to Defendant or within the possession, custody or control of third
20 parties or public records, and therefore equally available to Defendant.

21 8. Plaintiff asserts these objections without waiving or intending to waive any
22 objections as to competency, relevancy, materiality, or privilege.

23 9. Plaintiff objects to each Interrogatory to the extent that it calls for a legal
24 conclusion.

25 10. Plaintiff states these objections without waiving or intending to waive, but on the
26 contrary preserving and intending to preserve:

27 a. all objections to genuineness, foundation, competency, relevancy,
28 materiality, privilege and admissibility as evidence for any purpose of materials produced in

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1 response to the Interrogatories, or subject matter thereof, in any subsequent proceeding in, or the
2 trial of, this or any action;

3 b. the right to object on any permissible ground to the use of any materials, or
4 the subject matter thereof, in any subsequent proceeding in, or the trial of, this or any other
5 action; and

6 c. the right to object on any basis permitted by law to any other discovery
7 request or proceeding involving or relating to the subject matter of these objections.

RESPONSES TO DEFENDANT’S FIRST SET OF INTERROGATORIES

INTERROGATORY NO. 1:

10 IDENTIFY all FACEBOOK accounts YOU have ever established or used, including, for
11 each account: (a) YOUR username; (b) the name YOU provided to FACEBOOK in setting up
12 the account; (c) the e-mail address that YOU associated with the account; (d) the mobile
13 telephone number(s) that YOU associated with the account; (e) the date YOUR account was
14 established; and (f) the date YOUR account was disabled, suspended, or deleted (if applicable).

RESPONSE TO INTERROGATORY NO. 1:

16 Plaintiff incorporates and references herein all of the General Objections. Plaintiff objects
17 to this Interrogatory as overly broad and unduly burdensome. Plaintiff further objects to the
18 extent this Interrogatory seeks information protected by Plaintiff’s right to privacy. Subject to
19 and without waiver of the foregoing objections, Plaintiff states as follows:

20 Plaintiff’s Facebook username is [REDACTED] Plaintiff provided Facebook with the name
21 David Shadpour. Plaintiff associated the email address [REDACTED] with the
22 account. Plaintiff did not associate any phone number with the account. Plaintiff’s account was
23 established in or around February 2006. It has not been disabled.

INTERROGATORY NO. 2:

25 IDENTIFY all facts regarding all messages YOU have sent or received via the
26 FACEBOOK MESSAGES PRODUCT, including, for each message: (a) the date the message
27 was sent; (b) the author of the message; (c) the recipient(s) of the message; (d) the physical
28 location (city and state) where the author was located when the message was sent (or, if unknown,

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1 the author’s state of residence); (e) the physical location (city and state) where the recipient(s)
2 was located when the message was received (or, if unknown, the recipient’s state of residence);
3 (f) if a URL was included in the message, the name of the URL(s); (g) if a URL was included in
4 the message, whether a “preview” of the website associated with the URL was contained in the
5 message (if known); and (h) if a URL was included in the message, whether the website
6 associated with the URL contained a FACEBOOK social plugin at the time the message was sent
7 (if known).

8 **RESPONSE TO INTERROGATORY NO. 2:**

9 Plaintiff incorporates and references herein all of the General Objections. Plaintiff objects
10 to this Interrogatory as overly broad and unduly burdensome. Plaintiff objects to this
11 Interrogatory insofar as it seeks facts regarding messages that do not contain URLs, and insofar
12 as it seeks the physical location of the sender or recipient of Facebook messages, and therefore
13 does not seek information “that is relevant to the claims or defenses of any party” or “reasonably
14 calculated to lead to the discovery of admissible evidence.” Fed. R. Civ. P. 26(b)(1). Plaintiff
15 further objects to the extent this Interrogatory seeks information protected by Plaintiff’s and/or
16 third parties’ right to privacy. Plaintiff objects that this Interrogatory seeks information already in
17 Defendant’s possession and control. Insofar as it seeks information to be obtained through
18 discovery from Defendant, for example because Facebook possesses information concerning
19 whether it was Facebook’s practice to provide a “preview” for URL’s sent at the times of
20 Plaintiff’s private messages, or whether the websites associated with certain URLs had installed
21 Facebook’s social plug-ins, Plaintiff objects to this Interrogatory as premature. Plaintiff further
22 objects to this Interrogatory as compound. Subject to and without waiver of the foregoing
23 objections, Plaintiff states as follows: The table attached as Exhibit 1 identifies the sender(s),
24 recipient(s), date, and URL associated with each such private message.

25 Plaintiff does not recall whether any of the URLs included in private messages that
26 Plaintiff has sent or received via the FACEBOOK MESSAGES PRODUCT contained a
27 “preview” at the time it was sent or received. Plaintiff is not aware of whether the websites
28

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1 associated with such URLs contained a Facebook plug-in at the time these messages were sent or
2 received.

3 **INTERROGATORY NO. 3:**

4 IDENTIFY all PERSONS YOU have sent messages to or received messages from via the
5 FACEBOOK MESSAGES PRODUCT, including each PERSON’S name, address, and
6 FACEBOOK account username, or if the PERSON was not a FACEBOOK user, the PERSON’S
7 mobile telephone number and/or email address from which a message was received or to which a
8 message was sent.

9 **RESPONSE TO INTERROGATORY NO. 3:**

10 Plaintiff incorporates and references herein all of the General Objections. Plaintiff objects
11 to this Interrogatory as overly broad and unduly burdensome. Plaintiff objects to this
12 Interrogatory insofar as it seeks facts regarding messages that do not contain URLs and
13 therefore does not seek information “that is relevant to the claims or defenses of any party” or
14 “reasonably calculated to lead to the discovery of admissible evidence.” Fed. R. Civ. P. 26(b)(1).
15 Plaintiff further objects to the extent this Interrogatory seeks information protected by Plaintiff’s
16 or third parties’ right to privacy. Subject to and without waiver of the foregoing objections,
17 Plaintiff states as follows: Plaintiff incorporates by reference the table provided in response to
18 Interrogatory No. 2, which identifies the sender(s), recipient(s), date, and URL associated with
19 each such message.

20 **INTERROGATORY NO. 4:**

21 IDENTIFY all facts regarding all EMAIL SERVICES and SOCIAL NETWORKING
22 WEBSITES, including but not limited to applications offered within those SOCIAL
23 NETWORKING WEBSITES, that YOU have used, including, for each, YOUR e-mail address
24 and/or username and the duration (time period) of YOUR use.

25 **RESPONSE TO INTERROGATORY NO. 4:**

26 Plaintiff incorporates and references herein all of the General Objections. Plaintiff objects
27 to this Interrogatory as overly broad and unduly burdensome. Plaintiff objects to this
28 Interrogatory in that does not seek information “that is relevant to the claims or defenses of any

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1 party” or “reasonably calculated to lead to the discovery of admissible evidence.” Fed. R. Civ. P.
2 26(b)(1). Plaintiff further objects to the extent this Interrogatory seeks information protected by
3 Plaintiff’s or third parties’ right to privacy. Subject to and without waiver of the foregoing
4 objections, Plaintiff states as follows: Plaintiff recalls using the following email services:

5 [REDACTED] username [REDACTED], used from approximately late 2012 to present.

6 [REDACTED] username [REDACTED], used from approximately 2007 to present.

7 [REDACTED] username [REDACTED] used from approximately August 2013 to present.

8 [REDACTED] email, username [REDACTED], used from approximately 2003 to
9 present.

10 Facebook.com as stated in response to Interrogatory No. 1.

11 **INTERROGATORY NO. 5:**

12 IDENTIFY all facts regarding how and when YOU first became aware of FACEBOOK’s
13 alleged conduct referenced in YOUR COMPLAINT.

14 **RESPONSE TO INTERROGATORY NO. 5:**

15 Plaintiff incorporates and references herein all of the General Objections. Plaintiff objects
16 to this Interrogatory as overly broad and unduly burdensome. Plaintiff further objects to the extent
17 this Interrogatory purports to seek information covered by the attorney-client privilege or the
18 work product privilege. Subject to and without waiver of the foregoing objections, Plaintiff states
19 as follows: Plaintiff first became aware that Facebook scans private messages containing URLs in
20 or around December 2013 in connection with counsel’s investigation of this case.

21 **INTERROGATORY NO. 6:**

22 IDENTIFY all facts that support YOUR claim that YOU, other Plaintiffs in this ACTION,
23 and/or putative class members suffered harm and/or damage as a result of YOUR use of the
24 FACEBOOK MESSAGES PRODUCT, including but not limited to IDENTIFYING all facts
25 describing how YOU, Plaintiffs, and/or putative class members were harmed.

26 **RESPONSE TO INTERROGATORY NO. 6:**

27 Plaintiff incorporates and references herein all of the General Objections. Plaintiff objects
28 to this Interrogatory as overly broad and unduly burdensome. Plaintiff objects to this

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1 Interrogatory on the grounds that it is untimely and premature because discovery in this action is
2 ongoing with substantial discovery yet to occur. Plaintiff objects that Plaintiff has not completed
3 his discovery or investigation of facts relating to this matter, and has not completed preparation
4 for trial, and therefore, this interrogatory is premature, improper, burdensome, oppressive,
5 harassing, and abusive of the discovery process to the extent that it calls for the disclosure of all
6 facts that support the contentions and allegations in the Complaint. *See* Fed. R. Civ. P.
7 33(a)(2)(“the court may order that [contention interrogatories] need not be answered until
8 designated discovery is complete, or until a pretrial conference or some other time.”). Plaintiff
9 further objects to this Interrogatory on the grounds that it is premature, as this Interrogatory may
10 be the subject of expert testimony, to be disclosed at a later date in accordance with the time set
11 by the Court for such disclosures. Subject to and without waiver of the foregoing objections,
12 Plaintiff states as follows: Plaintiff refers to the entirety of the operative Complaint, including but
13 not limiting the following allegations Paragraphs 38, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57
14 and 58.

15 **INTERROGATORY NO. 7:**

16 Separately for YOURSELF and the putative class, IDENTIFY all facts regarding the
17 damages and/or all other monetary relief that YOU and the putative class claim in this ACTION.

18 **RESPONSE TO INTERROGATORY NO. 7:**

19 Plaintiff incorporates and references herein all of the General Objections. Plaintiff objects
20 to this Interrogatory as overly broad and unduly burdensome. Plaintiff objects to this
21 Interrogatory on the grounds that it is untimely and premature because discovery in this action is
22 ongoing with substantial discovery yet to occur. Plaintiff objects that Plaintiff has not completed
23 his discovery or investigation of facts relating to this matter, and has not completed preparation
24 for trial, and therefore, this Interrogatory is premature, improper, burdensome, oppressive,
25 harassing, and abusive of the discovery process to the extent that it calls for the disclosure of all
26 facts that support the contentions and allegations in the Complaint. Plaintiff further objects to this
27 Interrogatory on the grounds that it is premature, as this Interrogatory may be the subject of
28 expert testimony, to be disclosed at a later date in accordance with the time set by the Court for

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1 such disclosures. Subject to and without waiver of the foregoing objections, Plaintiff states as
2 follows: *See* Plaintiff’s responses to Interrogatories No. 2 and 6.

3 **INTERROGATORY NO. 8:**

4 IDENTIFY all facts regarding all putative class action proceedings in which YOU have
5 been involved, including but not limited to YOUR role in the proceeding (plaintiff, defendant,
6 witness), the claims and defenses raised in each proceeding, the court or other tribunal in which
7 the proceeding occurred, the judicial officer or arbitrator(s) who presided over the proceeding, the
8 case number, the parties to the proceeding, a summary of the testimony and/or DOCUMENTS
9 YOU provided (if any), an identification of YOUR counsel for each proceeding, and the
10 disposition and relief awarded.

11 **RESPONSE TO INTERROGATORY NO. 8:**

12 Plaintiff incorporates and references herein all of the General Objections. Plaintiff further
13 objects that the Interrogatory seeks irrelevant information. Subject to and without waiver of the
14 foregoing objections, Plaintiff states as follows: Plaintiff has not been involved in any other
15 putative class action proceedings.

16 **INTERROGATORY NO. 9:**

17 IDENTIFY all facts that support YOUR allegation in paragraph 25 of YOUR
18 COMPLAINT that the “interceptions” YOU contend are unlawful occur “in transit, in
19 transmission, and/or during transfer of users’ private messages.”

20 **RESPONSE TO INTERROGATORY NO. 9:**

21 Plaintiff incorporates and references herein all of the General Objections. Plaintiff objects
22 to this Interrogatory as overly broad and unduly burdensome. Plaintiff objects to this
23 Interrogatory on the grounds that it is untimely and premature because discovery in this action is
24 ongoing with substantial discovery yet to occur. Plaintiff objects that Plaintiff has not completed
25 his discovery or investigation of facts relating to this matter, and has not completed preparation
26 for trial, and therefore, this Interrogatory is premature, improper, burdensome, oppressive,
27 harassing, and abusive of the discovery process to the extent that it calls for the disclosure of all
28 facts that support the contentions and allegations in the Complaint. See Fed. R. Civ. P.

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1 33(a)(2)(“the court may order that [contention interrogatories] need not be answered until
2 designated discovery is complete, or until a pretrial conference or some other time.”). Plaintiff
3 further objects to this Interrogatory on the grounds that it is premature, as this Interrogatory may
4 be the subject of expert testimony, to be disclosed at a later date in accordance with the time set
5 by the Court for such disclosures. Plaintiff further objects to the extent this Interrogatory purports
6 to seek information covered by the attorney work product privilege. Subject to and without
7 waiver of the foregoing objections, Plaintiff states as follows: Plaintiff refers to the entirety of the
8 operative Complaint, including but not limited to the allegations set forth in Paragraphs 27, 28,
9 35, 36, 37, 40.

10 **INTERROGATORY NO. 10:**

11 IDENTIFY all facts that support YOUR allegation in paragraph 89 of YOUR
12 COMPLAINT that “Facebook’s practice of intercepting, scanning, and generating ‘Likes’ from,
13 users’ private messages, are not necessary for the rendition of Facebook’s private messaging
14 service, the protection of Facebook’s rights or property, or the security of Facebook users,” and
15 “have not be undertaken in the ordinary course of business of an electronic communication
16 service, as described in 28 U.S.C. § 2510(15).”

17 **RESPONSE TO INTERROGATORY NO. 10:**

18 Plaintiff incorporates and references herein all of the General Objections. Plaintiff objects
19 to this Interrogatory as overly broad and unduly burdensome. Plaintiff objects to this
20 Interrogatory on the grounds that it is untimely and premature because discovery in this action is
21 ongoing with substantial discovery yet to occur. Plaintiff objects that Plaintiff has not completed
22 his discovery or investigation of facts relating to this matter, and has not completed preparation
23 for trial, and therefore, this Interrogatory is premature, improper, burdensome, oppressive,
24 harassing, and abusive of the discovery process to the extent that it calls for the disclosure of all
25 facts that support the contentions and allegations in the Complaint. *See Fed. R. Civ. P.*

26 33(a)(2)(“the court may order that [contention interrogatories] need not be answered until
27 designated discovery is complete, or until a pretrial conference or some other time.”). Plaintiff
28 objects to this Interrogatory on the grounds that it is premature, as this Interrogatory may be the

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1 subject of expert testimony, to be disclosed at a later date in accordance with the time set by the
2 Court for such disclosures. Plaintiff further objects to the extent this Interrogatory purports to
3 seek information covered by the attorney-client privilege or the work product privilege.

4 Subject to and without waiver of the foregoing objections, Plaintiff states as follows:
5 Plaintiff refers to the operative Complaint, including but not limited to the following allegations,
6 2, 4, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40,
7 45, 46, 47, 48, 49, 52, 56, 57, 58, 64, and 86, which identify the elements of causes of action
8 under the federal Electronic Communications Privacy Act, and Section 631 of the California
9 Penal Code, respectively, as well as identify which facts Plaintiff contends establish violations of
10 each element of each of these statutes.

11 **INTERROGATORY NO. 11:**

12 IDENTIFY all facts that support YOUR allegations in paragraphs 59–68 of the
13 COMPLAINT that this ACTION is appropriate for class treatment.

14 **RESPONSE TO INTERROGATORY NO. 11:**

15 Plaintiff incorporates and references herein all of the General Objections. Plaintiff objects
16 to this Interrogatory on the grounds that it is untimely and premature because discovery in this
17 action is ongoing with substantial discovery yet to occur. Plaintiff objects that Plaintiff has not
18 completed his discovery or investigation of facts relating to this matter, and has not completed
19 preparation for trial, and therefore, this Interrogatory is premature, improper, burdensome,
20 oppressive, harassing, and abusive of the discovery process to the extent that it calls for the
21 disclosure of all facts that support the contentions and allegations in the Complaint. See Fed. R.
22 Civ. P. 33(a)(2)(“the court may order that [contention interrogatories] need not be answered until
23 designated discovery is complete, or until a pretrial conference or some other time.”). Plaintiff
24 further objects to this Interrogatory on the grounds that it is premature, as this Interrogatory may
25 be the subject of expert testimony, to be disclosed at a later date in accordance with the time set
26 by the Court for such disclosures.

27 Subject to and without waiver of the foregoing objections, Plaintiff states as follows:
28 Plaintiff refers to the entirety of the operative Complaint, including but not limited to the

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1 allegations in Paragraphs 2, 3, 4, 15, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32,
2 33, 34, 35, 36, 37, 38, 39, 40, 41, 45, 46, 47, 48, 49, 50, 51, 52, 56, 57, 58, 62, 63, 64, and 65.

3
4 Dated: April 2, 2015

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

5
6 By: /s/ Michael W. Sobol
Michael W. Sobol

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Attorneys for Plaintiffs and the Proposed Class

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PROOF OF SERVICE

1
2 I am a citizen of the United States and employed in San Francisco County, California. I
3 am over the age of eighteen years and not a party to the within-entitled action. My business
4 address is 275 Battery Street, 29th Floor, San Francisco, California 94111-3339.

5 I am readily familiar with Lieff, Cabraser, Heimann & Bernstein, LLP’s practice for
6 collection and processing of documents for service via email, and that practice is that the
7 documents are attached to an email and sent to the recipient’s email account.

8 I am also readily familiar with this firm’s practice for collection and processing of
9 correspondence for mailing with the United States Postal Service. Following ordinary business
10 practices, the envelope was sealed and placed for collection and mailing on this date, and would,
11 in the ordinary course of business, be deposited with the United States Postal Service on this date.

12 On April 2, 2015, I caused to be served copies of the following documents:

- 13
14 **1. PLAINTIFF DAVID SHADPOUR’S CORRECTED**
OBJECTIONS AND RESPONSES TO DEFENDANT
FACEBOOK, INC.’S FIRST SET OF INTERROGATORIES;
15 **and this**
- 16 **2. PROOF OF SERVICE BY EMAIL AND U.S. MAIL**

17 on Defendant in this action through their counsel:

18 Christopher Chorba
19 Gibson, Dunn & Crutcher LLP
333 South Grand Avenue
20 Los Angeles, CA 90071-3197
Email: cchorba@gibsondunn.com

21 Joshua Aaron Jessen
22 Gibson Dunn & Crutcher LLP
3161 Michelson Drive, Suite 1200
23 Irvine, CA 92612
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24
25 Executed on April 2, 2015, at San Francisco, California.

26 /s/ Melissa A. Gardner
27 Melissa A. Gardner

EXHIBIT 1

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

	To	From	Date	URL
1.	[REDACTED]	David Shadpour	January 9, 2011	[REDACTED]
2.	[REDACTED]	David Shadpour	November 29, 2012	
3.	[REDACTED]	David Shadpour	November 29, 2012	
4.	[REDACTED]	David Shadpour	November 29, 2012	
5.	[REDACTED]	David Shadpour	December 31, 2013	
6.	[REDACTED]	David Shadpour	June 9, 2014	
7.	[REDACTED]	David Shadpour	June 9, 2014	
8.	[REDACTED]	David Shadpour	June 9, 2014	
9.	[REDACTED]	David Shadpour	June 10, 2014	
10.	[REDACTED]	David Shadpour	May 14, 2012	
11.	[REDACTED]	David Shadpour	June 28, 2012	
12.	[REDACTED]	David Shadpour	September 27, 2012	
13.	[REDACTED]	David Shadpour	September 27, 2012	
14.	David Shadpour	[REDACTED]	October 31, 2012	
15.	David Shadpour	[REDACTED]	October 31, 2012	
16.	David Shadpour	[REDACTED]	April 18, 2013	
17.	[REDACTED]	David Shadpour	January 11, 2014	
18.	[REDACTED]	David Shadpour	November 20, 2011	
19.	[REDACTED]	David Shadpour	December 19, 2011	
20.	[REDACTED]	David Shadpour	January 10, 2012	
21.	David Shadpour	[REDACTED]	January 17, 2012	
22.	David Shadpour	[REDACTED]	January 17, 2012	

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

	To	From	Date	URL
23.	[REDACTED]	David Shadpour	March 9, 2012	[REDACTED]