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 FACEBOOK, INC.

13
 14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 OAKLAND DIVISION

17 MATTHEW CAMPBELL and MICHAEL
 HURLEY,

18 Plaintiffs,

19 v.

20 FACEBOOK, INC.,

21 Defendant.

Case No. C 13-05996 PJH

PUTATIVE CLASS ACTION

**DECLARATION OF ALEX HIMEL IN
 SUPPORT OF DEFENDANT FACEBOOK,
 INC.'S OBJECTION TO AND REQUEST
 TO STRIKE NEW EVIDENCE AND
 MISSTATEMENTS OF FACT
 CONTAINED IN PLAINTIFFS' REPLY IN
 SUPPORT OF THEIR MOTION FOR
 CLASS CERTIFICATION**

1 I, Alex Himel, declare as follows:

2 1. I have been employed as a software engineer at Facebook since April 2009, and my
3 current title is Engineering Director. I am over the age of 18. I have personal knowledge of the
4 matters stated herein and, if called as a witness, could and would testify competently thereto.

5 2. I provide this Declaration in support of Facebook’s Objection to New Evidence in
6 Plaintiffs’ Reply In Support of Motion for Class Certification in order to address some of the new
7 assertions in the evidence submitted in support of that brief.

8 **Dr. Golbeck’s New Proposal to Identify Class Members**

9 3. Dr. Golbeck states that “[b]y starting with a list of all message IDs, a [Titan] database
10 query could be written that would identify the senders and recipients of Private Messages sent during
11 the Class Period with URL attachments (and corresponding EntShares),” and that “Entshares can be
12 queried to determine whether they were created from URLs sent in Private Messages, and thus,
13 combined with the query related to Titan . . . which returns the IDs of Entshares associated with
14 specific Private Messages.” (New Golbeck Report dated Feb. 19, 2016 (Dkt. 166-7) ¶¶ 9, 12.) Dr.
15 Golbeck contends that, through these methods, “Class members can be readily identified.” (*Id.* ¶ 12.)

16 4. I understand that Facebook engineer Dale Harrison has submitted a declaration (dated
17 February 26, 2016) regarding potentially querying Titan-related data, which explains that Dr.
18 Golbeck’s proposed Titan query relies on inaccurate assumptions and could not be executed. Mr.
19 Harrison also explains that, if Facebook were to attempt to write and execute code to identify all
20 message IDs and iterate through each “action” related to each message, he estimates that—even if
21 such a procedure were possible at all—it could take approximately 12 months to run.

22 5. Similarly, Dr. Golbeck’s proposal to query “EntShare” data also relies on the incorrect
23 assumption that such data is indexed in a table or other easily searchable format. It is not, and Dr.
24 Golbeck’s proposal is logistically impossible as the data is currently organized. A query of all data
25 related to EntShares would require actually loading each EntShare (i.e., copying it from its permanent
26 storage location into another storage location to perform the operations that Dr. Golbeck proposes).
27 Next, Facebook would need to analyze the actual data in the fields for each individual EntShare.

1 There are trillions of EntShares in Facebook’s systems. Although the system could accommodate a
2 handful of EntShares, I am not aware of a machine or group of machines at Facebook (or anywhere
3 else) capable of loading the trillions of EntShares for such a query without failing or timing out.

4 6. In other words, Dr. Golbeck’s new query is just as unworkable as her original query,
5 and is in fact even less feasible as it requires conducting three such queries: (i) first, to identify
6 message IDs; (ii) then to iterate over message records; and (iii) finally, to iterate over EntShare data.

7 **Scribe category “scribeh share stats”**

8 7. Dr. Golbeck appears to concede that URLs shared in messages were not logged in the
9 [REDACTED] table during the class period (see Himel Decl. dated Jan. 15, 2016 (Dkt. 152-3), ¶ 44).
10 In her new report, Dr. Golbeck instead focuses on a log called “scribeh_share_stats.” (New Golbeck
11 Report ¶ 28.) As a preliminary matter, “scribeh_share_stats” and [REDACTED] are entirely different
12 things: “scribeh_share_stats” is a *scribe category*, not a Hive table. Scribe is a logging system that
13 stores data for short periods of time for debugging and other purposes. The scribeh_share_stats
14 category retained data for a matter of days for use in the Realtime metrics system, which at one time
15 was used to update the counters in EntGlobalShares. (Ray He testified in his deposition that the
16 Realtime metrics system was notoriously unreliable and failed regularly, and Facebook ultimately
17 discontinued its use.)

18 8. Dr. Golbeck does not identify any code linking “scribeh_share_stats” to the
19 [REDACTED] Hive table, let alone any evidence that any such data was being logged to the
20 [REDACTED] table (or that the table even existed) during the class period. Indeed, it is very common
21 to write data to Scribe, but not load that data to Hive or use it for any dedicated purpose.

22 9. Dr. Golbeck also states that she ran a search and found “many results related to
23 [REDACTED] (*Id.* ¶ 35.) However, none of these files suggests (let alone evidences) the continuing
24 existence of the [REDACTED] table. The [REDACTED] Hive table was dropped before the proposed
25 class period began, and no URLs shared in messages were logged there during the class period.

26 **Additional Misstatements**

27 10. Dr. Golbeck makes a number of additional misstatements in her new report not
28

ATTORNEY ATTESTATION

1 I, Christopher Chorba, attest that concurrence in the filing of this Declaration of Alex Himel
2 has been obtained from the signatory. I declare under penalty of perjury under the laws of the United
3 States of America that the foregoing is true and correct. Executed this 26th day of February, 2016, in
4 Los Angeles, California.

5
6 Dated: February 26, 2016

/s/ Christopher Chorba
Christopher Chorba