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

17 MATTHEW CAMPBELL and MICHAEL  
 HURLEY,

18 Plaintiffs,

19 v.

20 FACEBOOK, INC.,

21 Defendant.  
 22

Case No. C 13-05996 PJH (MEJ)

**SUPPLEMENTAL DECLARATION OF  
 ALEX HIMEL TO CORRECT AND  
 CLARIFY THE RECORD**

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 have personal knowledge of the matters stated herein and, if  
4 called as a witness, could and would testify competently thereto. I submit this Supplemental  
5 Declaration to correct and clarify a small portion of my previous testimony.

6 2. I provided a Declaration dated January 14, 2016 in support of Facebook’s Opposition  
7 to Plaintiffs’ Motion for Class Certification (Dkt. No. 184-11) and a Declaration dated February 26,  
8 2016 in support of Facebook’s Objection to and Request to Strike New Evidence and Misstatements  
9 of Fact in Plaintiffs’ Reply in support of their Motion for Class Certification (Dkt. No. 184-21). I  
10 also gave oral testimony in my individual capacity during a deposition on February 4, 2016.

11 3. In my declarations and my deposition, I explained that before the start of Plaintiffs’  
12 proposed class period (December 30, 2011), in some circumstances certain data regarding URL  
13 attachments sent with Facebook messages *may* have been logged in a Hive table called “share\_stats,”  
14 which was used in certain circumstances for Facebook’s Recommendations social plugin; after the  
15 start of the proposed class period, however, no data regarding URL attachments sent with Facebook  
16 messages were logged in “share\_stats.” (Dkt. No. 184-11 ¶¶ 44-50; Dkt. No. 184-21 ¶¶ 7-9; Himel  
17 Deposition, Feb. 4, 2016, 203:10-18, 204:16-17.) Those statements are correct. But in this  
18 testimony, I also said that the “share\_stats” table itself was deleted prior to the beginning of the class  
19 period. (*Id.*) I believed that statement to be true at the time of my testimony based on my review of  
20 Facebook’s records, but in the course of re-reviewing those records recently in connection with a  
21 discovery dispute, I learned that the “share\_stats” table itself existed for a very brief period of time at  
22 the beginning of the proposed class period. Specifically, rather than being deleted before December  
23 30, 2011, the table was deleted on January 21, 2012—which is 22 days after the start of the proposed  
24 class period.

25 4. In the course of re-reviewing Facebook’s records, I also re-confirmed that logging to  
26 the “share\_stats” table did indeed stop before the start of the proposed class period (specifically, in  
27 August 2011). I understand that the records substantiating these facts are being provided to  
28 Plaintiffs’ counsel. Therefore, although the “share\_stats” table itself existed for a short period of time



**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 11th day of May, 2016, in Los  
4 Angeles, California.  
5

6 Dated: May 11, 2016

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*/s/ Christopher Chorba*  
Christopher Chorba