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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

**JOINT NOTICE OF REILING OF
 DOCUMENTS ACCOMPANYING CLASS
 CERTIFICATION BRIEFS AND
 EVIDENTIARY OBJECTIONS**

1 Pursuant to this Court’s Order dated May 18, 2016 (Dkt. 193), Plaintiffs and Defendant
2 Facebook, Inc. jointly file replacement versions of the following documents accompanying their class
3 certification briefs and evidentiary objections:

4 (1) **Plaintiffs’ Motion for Class Certification (Dkt. 178-1)**: Plaintiffs’ Motion for Class
5 Certification, and Exhibits 2-3, 5-11, 14-18, 27-30 and 34 to the Declaration of Melissa Gardner in
6 Support of Plaintiffs’ Motion for Class Certification (“Gardner Cert. Declaration”);

7 (2) **Defendant Facebook, Inc.’s Opposition to Plaintiffs’ Motion for Class Certification**
8 **(Dkt. 178-2)**: Exhibits BB, CC, EE, and KK to the Declaration of Christopher Chorba In Support of
9 Defendant Facebook, Inc.’s Opposition to Plaintiffs’ Motion for Class Certification (“Chorba
10 Declaration”); and Exhibit NN to the Declaration of Alex Himel In Support of Defendant Facebook,
11 Inc.’s Opposition to Plaintiffs’ Motion for Class Certification (“Himel Declaration”);

12 (3) **Plaintiffs’ Reply in Support of Motion for Class Certification (Dkt. 178-3)**: Exhibits 7
13 and 14-20 to the Declaration of David Slade in Support of Plaintiffs’ Motion for Class Certification
14 (“Slade Cert. Declaration”); and

15 (4) **Plaintiffs’ Response to Defendants’ “Objection To and Request to Strike New**
16 **Evidence and Misstatements of Fact” (Dkt. 178-5)**.

17 In its May 18 Order, this Court granted the parties’ joint administrative motion to seal
18 documents accompanying class certification briefs and evidentiary objections (Dkt. 181), including
19 Plaintiffs’ requests to seal (1) representations of the specific content of Plaintiffs’ Facebook
20 messages, and (2) information concerning third parties’ private affairs disclosed nowhere in public
21 filings and not relevant to the merits of the motion for class certification; and Facebook’s requests to
22 seal (1) information regarding the processes and functionality of Facebook’s security and anti-abuse
23 products and systems, (2) source code, and (3) the names of internal tables in Facebook’s databases.
24 (Dkt. 192.) The Court also clarified its prior ruling that the parties could redact the “names of people
25 who are not parties to the suit” (Dkt. 177 at 105), indicating that the Court had intended to “confine
26 that ruling to the names of non-representative class members,” not to the named Plaintiffs or
27 Facebook employees. (*Id.*) Accordingly, the Court ordered the parties to re-file their briefs and
28

1 exhibits and evidentiary objections with the names of the named Plaintiffs and Facebook employees
2 unredacted by June 15, 2016. (*Id.*)

3 **Plaintiffs' Motion for Class Certification (Dkt. 178-1)**

4 Attached as **Exhibit 1** is a true and correct copy of Plaintiffs' Motion for Class Certification,
5 filed at Dkt. 178-1. Exhibit 1 contains no redactions.

6 Attached as **Exhibit 2** is a true and correct copy of a redacted version of Exhibit 2 to the
7 Gardner Cert. Declaration, filed at Dkt. 183-4. The Court granted Facebook's motion to seal the
8 source code at 6:15-18, 6:21-22; 7:9-16; 10:15-17; 10:19-20; 10:22-23; 10:25-26; 11:1-2, 11:4-6;
9 11:7; 12:5-6; 13:19; 14:13-14; 14:25-26; 15:4-5; 15:10-11; 15:23; 15:25; 15:27; 16:1; 16:3; 16:8;
10 16:13; 23:10-26; 24:1-14; 26:23-24; 27:18-24; 28:24-26; and 29:4-9 (*see* Dkt. 192). The only other
11 redactions in Exhibit 2 are by Plaintiffs, and they are of the Facebook ID of one of the Plaintiffs (at
12 28:9-13).

13 Attached as **Exhibit 3** is a true and correct copy of Exhibit 3 to the Gardner Cert. Declaration,
14 filed at Dkt. 179-1. Exhibit 3 contains no redactions.

15 Attached as **Exhibit 4** is a true and correct copy of a redacted version of Exhibit 5 to the
16 Gardner Cert. Declaration, filed at Dkt. 184-3. The Court granted Facebook's motion to seal the
17 names of an internal table in Facebook's database at 232:14 (*see* Dkt. 192), and Exhibit 4 also
18 contains a redaction by Facebook of a Facebook employee's Facebook ID (*see* 270:3).

19 Attached as **Exhibit 5** is a true and correct copy of a redacted version of Exhibit 6 to the
20 Gardner Cert. Declaration, filed at Dkt. 179-2. The only redactions in Exhibit 5 are by Facebook, and
21 they are of Facebook employees' email addresses and a Facebook employee's phone number.

22 Attached as **Exhibit 6** is a true and correct copy of a redacted version of Exhibit 7 to the
23 Gardner Cert. Declaration, filed at Dkt. 179-3. The only redactions in Exhibit 6 are by Facebook, and
24 they are of Facebook employees' email addresses and a Facebook employee's phone number.

25 Attached as **Exhibit 7** is a true and correct copy of Exhibit 8 to the Gardner Cert. Declaration,
26 filed at Dkt. 179-4. Exhibit 7 contains no redactions.

27 Attached as **Exhibit 8** is a true and correct copy of Exhibit 9 to the Gardner Cert. Declaration,
28 filed at Dkt. 179-5. Exhibit 8 contains no redactions.

1 Attached as **Exhibit 9** is a true and correct copy of a redacted version of Exhibit 10 to the
2 Gardner Cert. Declaration, filed at Dkt. 179-6. The only redactions in Exhibit 9 are by Facebook, and
3 they are of Facebook employees' email addresses.

4 Attached as **Exhibit 10** is a true and correct copy of Exhibit 11 to the Gardner Cert.
5 Declaration, filed at Dkt. 179-7. Exhibit 10 contains no redactions.

6 Attached as **Exhibit 11** is a true and correct copy of Exhibit 14 to the Gardner Cert.
7 Declaration, filed at Dkt. 179-10. Exhibit 11 contains no redactions.

8 Attached as **Exhibit 12** is a true and correct copy of a redacted version of Exhibit 15 to the
9 Gardner Cert. Declaration, filed at Dkt. 179-11. The only redaction in Exhibit 12 is by Facebook,
10 and it is of a Facebook employee's email address.

11 Attached as **Exhibit 13** is a true and correct copy of Exhibit 16 to the Gardner Cert.
12 Declaration, filed at Dkt. 179-12. Exhibit 13 contains no redactions.

13 Attached as **Exhibit 14** is a true and correct copy of a redacted version of Exhibit 17 to the
14 Gardner Cert. Declaration, filed at Dkt. 179-13. The only redactions in Exhibit 14 are by Facebook,
15 and they are of Facebook employees' email addresses and a non-party's name and email address.

16 Attached as **Exhibit 15** is a true and correct copy of a redacted version of Exhibit 18 to the
17 Gardner Cert. Declaration, filed at Dkt. 179-14. The only redactions in Exhibit 15 are by Facebook,
18 and they are of Facebook employees' email addresses.

19 Attached as **Exhibit 16** is a true and correct copy of a redacted version of Exhibit 27 to the
20 Gardner Cert. Declaration, filed at Dkt. 179-15. The only redactions in Exhibit 16 are by Facebook,
21 and they are of Facebook employees' email addresses and a non-party's name and email address.

22 Attached as **Exhibit 17** is a true and correct copy of a redacted version of Exhibit 28 to the
23 Gardner Cert. Declaration, filed at Dkt. 179-16. The only redactions in Exhibit 17 are by Facebook,
24 and they are of Facebook employees' email addresses.

25 Attached as **Exhibit 18** is a true and correct copy of Exhibit 29 to the Gardner Cert.
26 Declaration, filed at Dkt. 179-17. Exhibit 18 contains no redactions.

27 Attached as **Exhibit 19** is a true and correct copy of a redacted version of Exhibit 30 to the
28 Gardner Cert. Declaration, filed at Dkt. 179-18. The only redactions in Exhibit 19 are by Facebook,

1 and they are of Facebook employees' email addresses.

2 Attached as **Exhibit 20** is a true and correct copy of a redacted version of Exhibit 34 to the Gardner
3 Cert. Declaration, filed at Dkt. 179-20. The only redactions in Exhibit 20 are by Facebook, and they
4 are of Facebook employees' email addresses.

5 **Defendant Facebook's Opposition to Plaintiffs' Motion for Class Certification (Dkt. 178-2):**

6 Attached as **Exhibit 21** is a true and correct copy of a redacted version of Exhibit BB to the
7 Chorba Declaration, filed at Dkt. 180-2. The only redactions in Exhibit 21 are by Facebook, and they
8 are of the home address of a Facebook employee (*see* Errata 9:23) and the email address of a
9 Facebook employee (*see* 50:20).

10 Attached as **Exhibit 22** is a true and correct copy of a redacted version of Exhibit CC to the
11 Chorba Declaration, filed at Dkt. 180-3. The only redactions in Exhibit 22 are by Facebook, and they
12 are of source code (*see* Errata pp. 3-4). Pursuant to the Court's previous order, these redactions did
13 not require the Court's further approval. (Dkt. 174.)

14 Attached as **Exhibit 23** is a true and correct copy of a redacted version of Exhibit EE to the
15 Chorba Declaration, filed at Dkt. 184-9. The Court granted Facebook's motion to seal the names of
16 internal tables in Facebook's databases at 293:6; 292:23; 293:6; 293:7; 293:17; 294:6; 295:16;
17 295:22; 296:4; 342:19; 342:21; 343:9; and 343:14. (*See* Dkt. 192.) Facebook also redacted the
18 source code at 294:4; 305:20; 307:22; 308:5. Pursuant to the Court's previous order, such redactions
19 did not require the Court's further approval. (Dkt. 174.) Exhibit 23 contains no other redactions.

20 Attached as **Exhibit 24** is a true and correct copy of Exhibit KK to the Chorba Declaration,
21 filed at Dkt. 180-7. Exhibit 24 contains no redactions.

22 Attached as **Exhibit 25** is a true and correct copy of a redacted version of Exhibit NN to the
23 Himel Declaration, filed at Dkt. 180-9. Exhibit 25 contains no redactions.

24 **Plaintiffs' Reply in Support of Motion for Class Certification (Dkt. 178-3)**

25 Attached as **Exhibit 26** is a true and correct copy of a redacted version of Exhibit 7 to the
26 Slade Cert. Declaration, filed at Dkt. 180-12. Redactions in Exhibit 26 are by both Facebook and
27 Plaintiffs, and they are of the email address and Facebook ID of one of the Plaintiffs, and the email
28 address and Facebook ID of a non-party (specifically, an absent class member).

1 Attached as **Exhibit 27** is a true and correct copy of a redacted version of Exhibit 14 to the
2 Slade Cert. Declaration, filed at Dkt. 180-17. Redactions in Exhibit 27 are by both Facebook and
3 Plaintiffs, and they are of the email address and Facebook ID of one of the Plaintiffs, and the name,
4 email address, and Facebook ID of a non-party (specifically, an absent class member).

5 Attached as **Exhibit 28** is a true and correct copy of a redacted version of Exhibit 15 to the
6 Slade Cert. Declaration, filed at Dkt. 180-18. Redactions in Exhibit 28 are by both Facebook and
7 Plaintiffs, and they are of the email address and Facebook ID of one of the Plaintiffs, and the name,
8 email address, and Facebook ID of a non-party (specifically, an absent class member).

9 Attached as **Exhibit 29** is a true and correct copy of a redacted version of Exhibit 16 to the
10 Slade Cert. Declaration, filed at Dkt. 180-19. Redactions in Exhibit 29 are by both Facebook and
11 Plaintiffs, and they are of the email address and Facebook ID of one of the Plaintiffs, and the name,
12 email address, and Facebook ID of a non-party (specifically, an absent class member).

13 Attached as **Exhibit 30** is a true and correct copy of a redacted version of Exhibit 17 to the
14 Slade Cert. Declaration, filed at Dkt. 180-20. Redactions in Exhibit 30 are by both Facebook and
15 Plaintiffs, and they are of the email address and Facebook ID of one of the Plaintiffs, and the name,
16 email address, and Facebook ID of a non-party (specifically, an absent class member).

17 Attached as **Exhibit 31** is a true and correct copy of a redacted version of Exhibit 18 to the
18 Slade Cert. Declaration, filed at Dkt. 180-21. Redactions in Exhibit 31 are by both Facebook and
19 Plaintiffs, and they are of the email address and Facebook ID of one of the Plaintiffs, and the names,
20 email addresses, and Facebook IDs of non-parties (specifically, absent class members).

21 Attached as **Exhibit 32** is a true and correct copy of a redacted version of Exhibit 19 to the
22 Slade Cert. Declaration, filed at Dkt. 180-22. Redactions in Exhibit 32 are by both Facebook and
23 Plaintiffs, and they are of the email address and Facebook ID of one of the Plaintiffs, and the name,
24 email address, and Facebook ID of a non-party (specifically, an absent class member).

25 Attached as **Exhibit 33** is a true and correct copy of a redacted version of Exhibit 20 to the
26 Slade Cert. Declaration, filed at Dkt. 180-23. Redactions in Exhibit 33 are by both Facebook and
27 Plaintiffs, and they are of the email address and Facebook ID of one of the Plaintiffs, and the name,
28 email address, and Facebook ID of a non-party (specifically, an absent class member).

1 **Plaintiffs' Response to Defendants' "Objection To and Request to Strike New Evidence and**
2 **Misstatements of Fact" (Dkt. 178-5)**

3 Attached as **Exhibit 34** is a true and correct copy of Plaintiffs' Response to Defendants'
4 "Objection To and Request to Strike New Evidence and Misstatements of Fact," filed at Dkt. 178-5.
5 Exhibit 34 contains no redactions.

6 Dated: June 15, 2016

Respectfully submitted,

7 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

8 By: _____/s/
9 Michael W. Sobol

10 Attorneys for Plaintiffs

11 GIBSON, DUNN & CRUTCHER LLP

12 By: _____/s/
13 Christopher Chorba

14 Attorneys for Defendant FACEBOOK, INC.