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MATTHEW CAMPBELL and MICHAEL
HURLEY, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

FACEBOOK, INC.,

Defendant.

Case No. C 13-05996 PJH (SK)

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' MOTION TO COMPEL
PRODUCTION OF DOCUMENTS**

Judge: Honorable Phyllis J. Hamilton

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19 Having considered Plaintiffs' Motion to Compel Production of Documents ("Motion"), all
20 materials submitted in support thereof, and other records on file, the Court hereby GRANTS the
21 Motion, and FINDS as follows:

22 1. Plaintiffs request that Facebook produce documents identified through further
23 document searches using Plaintiffs' proposed search terms and custodians reflected in Appendix
24 A to Plaintiffs' Motion. These terms relate to functionalities at issue in the claims articulated in
25 Court's class certification ruling (Dkt. 192, "Cert. Order") and Plaintiffs' Second Amended
26 Complaint (Dkt. 196, "SAC").

27 2. These keyword terms directly relate to Plaintiffs' claims and are proportional to
28 the needs of the case, pursuant to Fed. R. Civ. P. 26(b)(1).

1 3. Additionally, Plaintiffs’ proposed set of term-specific, keyword proximity limiting
2 terms—also identified in Exhibit A to Plaintiffs’ Motion—further narrows the scope of document
3 production, and satisfy the requirement of Fed. R. Civ. P. 26(b)(2) that discovery requests not be
4 overly burdensome or disproportionate.

5 Accordingly, the Court **ORDERS** as follows:

6 1. Facebook shall produce documents identified through further document searches
7 using Plaintiffs’ proposed search terms and custodians reflected in Appendix A to Plaintiffs’
8 Motion.

9 2. The document searches shall utilize the keyword proximity limiting terms
10 identified in Exhibit A of Plaintiffs’ Motion.

11 3. The document searches shall be conducted for all custodians identified in Exhibit
12 A to Plaintiffs’ Motion. Facebook shall further make a good faith effort to identify—and to
13 conduct document searches for—any additional custodians in possession of relevant documents.

14 4. Facebook shall conduct all searches and produce all documents within thirty days
15 of the entry of this Order.

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18 **It is so ORDERED.**

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20 Dated: _____

Phyllis J. Hamilton
United States District Judge